



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEDEX

Mr. James Bray
General Manager
Akzo Nobel Coatings Inc.
2837 Roanoke Avenue, S.W.
Roanoke, VA 24015

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Akzo Nobel Coatings Inc.
EPA ID No. VAD000019828
Reference No. C06-003

Dear Mr. Bray:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information to supplement the information obtained by EPA during the inspection of Akzo Nobel Coatings Inc., located in Roanoke, VA ("Facility") on April 12, 2005 (report enclosed). EPA is requesting this information pursuant to Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes" EPA hereby requires that you provide EPA, within twenty (20) calendar days of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the

document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, recordings, discs, computer print outs, computer files, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266, 268, and 273 shall have the meanings set forth therein.

Requested Information

1. The inspector observed a tank being used for the storage of hazardous waste at the facility. It was also observed that containers of hazardous waste are pumped into this tank.
 - a. Please provide a flow diagram of the movement of all hazardous wastes through the facility. The flow diagram should depict the movement of each hazardous waste from each point of generation to shipment from the facility. Please indicate all tanks, 90-day storage areas and satellite accumulation areas.
 - b. Please provide a narrative to accompany the flow diagram that explains the movement of all hazardous wastes in detail.
2. The inspection report describes a tank, identified as the Hazardous Waste Storage Tank, which apparently accumulates hazardous wastes from throughout the facility and is the location from which bulk shipments of hazardous waste are processed. (see Photographs 42, 47, 48 & 49)
 - a. Please describe the specific contents of the waste stream collected in the Main Hazardous Waste Storage Tank, indicating if it is a hazardous waste and identifying all applicable hazardous waste codes.
 - b. Please describe in detail any containers used to store the material that is withdrawn from the Main Hazardous Waste Storage Tank.
 - c. Provide a detailed list of all equipment, as defined in 40 C.F.R. § 264.1031, associated with the Main Hazardous Waste Storage Tank.
 - d. Provide information/documentation demonstrating that the Main Hazardous Waste Storage Tank and its associated equipment is or is **not** exempt from air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.
 - e. If the facility has determined this equipment is exempt, please provide the waste analysis plan, as specified in 40 C.F.R. § 265.1063(d), along with either the sample results or process knowledge documentation upon which the exemption is

based.

- f. If the facility has determined the facility **is not** exempt, please provide documentation, as of April 12, 2005, to support that the ancillary equipment associated with this waste stream **was** fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.
 - g. Please describe in detail any and all measures the facility has instituted since April 12, 2005, to document that the ancillary equipment associated with this waste stream **is** fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.
 - h. Please provide the date when the storage of hazardous waste in the Hazardous Waste Storage Tank first commenced.
 - i. Please provide the documentation, as defined in 40 C.F.R. § 265.195, of the inspections of the Hazardous Waste Storage Tank and associated equipment for the **past three (3) years**.
 - j. During EPA's April 12, 2005 CEI the inspector observed a damaged area of the secondary containment wall surrounding the Hazardous Waste Storage Tank. (See Photographs 50 & 51) With regard to this damaged area, please answer the following:
 - i. For this damaged area, please refer to the attached photos and provide a detailed description of how the damage occurred.
 - ii. Please state the exact date on which this damage occurred and how the facility became aware of it.
 - iii. For both questions i and ii above, provide documentation supporting your response to each of these questions.
 - iv. Has the damaged area of the secondary containment wall been repaired? If so, please provide a detailed description of how the secondary containment wall was repaired, the date such repair occurred and photographs of the repaired secondary containment wall.
3. While inspecting the Main <90-Day Hazardous Waste Storage Area, the inspector observed the following:
- a. Four (4) 5-Gal containers (See Photograph 43) One of these containers was observed to have a hazardous label, none of these containers was observed to be marked with an accumulation start date.
 - b. Three (3) 5-Gal containers (See Photographs 44 & 45) These three containers were all observed to be labeled as hazardous waste and marked with accumulation start dates. None of these three containers was observed to be "closed".
 - c. One burlap bag (See Photograph 46) This bag was observed to be labeled with a hazardous waste label. No accumulation start date was observed. With regard to each of these containers:

- i. Please provide a detailed description of the process or processes which generated the materials in each of these containers.
- ii. Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- iii. State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.
- iv. If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.
- v. Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.
- vi. State in each case whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytic results. If the determination was based on analytical results, provide any and all such results.
- vii. Were any of these containers shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- viii. If any of these containers were shipped off-site, provide copies of **all** bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

4. While inspecting the Product Work-Off Area, the inspector observed a pallet (See Photograph 55) of 35 (5-gal containers) The facility representative stated they were not workoffs but was unsure of their contents and their destination. Additionally, a steel container was observed that was labeled "LAC BAGS". (See Photograph 54) The facility representative stated that this container should be labeled as hazardous waste and moved to the <90-Day Hazardous Waste Storage Area. With regard to each of these containers:

- a. Please provide a detailed description of the process or processes which generated the materials in each of these containers.
- b. Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.
- d. If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.
- e. Were the materials in any of these containers determined to be "hazardous

waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.

- f. State in each case whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
- g. Were any of these containers shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. If any of these containers were shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

5. While inspecting the Stain Section of the Manufacturing Building the inspector observed liquid on the floor that the facility representative for this area stated was left over after product transfer and tank cleaning. (See Photographs 29 & 30) The representative further stated that the material on the floor is usually cleaned up and disposed of after transfer.
With regard to this material:

- a. Please provide a detailed description of the process or processes which generated the material(s) observed. State why the material(s) are not contained.
- b. Provide a detailed description of the procedure employed to collect these material(s) into containers. Include a list of all equipment that is used.
- c. Describe the contents of this material observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- d. State whether a "waste determination" and "LDR determination" was made for the material observed.
- e. If a "waste determination" and "LDR determination" were made for the material observed, state when each such determination was made.
- f. Was the material observed in Photograph 29 determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in this material.
- g. State in each case whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results. If this waste fits a profile for a specific waste stream, provide the analytical results for the specific profile.

6. While inspecting the Lacquer Section of the Manufacturing Building the inspector observed a 55-gallon container labeled as "Filter Drum". It was noted that the container was not closed and that a hose was draped into the container. (See Photograph 35)

- a. Please provide a detailed description of the process or processes which

generated the materials in this container.

- b. Describe the contents of this container observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of this container.
- d. If a "waste determination" and "LDR determination" were made for the contents of this container, state when such determination was made.
- e. Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in this container.
- f. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
- g. Was this container shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. If this container was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of this container.
- i. Explain the function of the hose that was observed draped into the container. Be sure to include a statement as to whether any material(s) are being added to the container from this hose. If so, provide a full description of each and every material being added from the hose and the source of these materials.

7. While inspecting the UV Manufacturing building, the inspector observed a 5-gal container that held used rags. The container was not observed to be labeled as hazardous waste. (See Photograph 36) With regard to this container:

- a. Please provide a detailed description of the process or processes which generated the materials in this container.
- b. Describe the contents of this container observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of this container.
- d. If a "waste determination" and "LDR determination" were made for the contents of this container, state when such determination was made.
- e. Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in this container.

- f. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
- g. Was this container shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. If this container was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of this container.

7. While inspecting the individual laboratories in the Main Office and Research and Development building, the inspector observed an open 5-gal container in each of: Lacquer Lab #2 (Photograph 4), Lacquer Lab #1 (Photograph 6), UV Lab (Photograph 9) and the Large Workroom (Photograph 13). The open container in Lacquer Lab #1 and in the large workroom were additionally observed to not be labeled as Hazardous Waste. With regard to each of these containers:

- a. Please provide a detailed description of the process or processes which generated the materials in each of these containers.
- b. Describe the contents of each of these containers observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of each of these containers.
- d. If a "waste determination" and "LDR determination" were made for the contents of each of these containers, state when each such determination was made.
- e. Were the materials in any of these containers determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in each of these containers.
- f. State in each case whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
- g. Were any of these containers shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. If any of these containers were shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of any said container.

8. While inspecting the Physical Testing Laboratory in the Main Office and Research and Development Building the inspector observed a 5-gal container labeled as "Hazardous Waste" and "Mercury Waste". (See Photograph 5) This container was observed not to be closed at the time of inspection. The facility representative stated that broken thermometers from the various labs in this building are collected here. He further stated that they would be under the control of the Technical Director of the Laboratory. With regard to this container:

- a. Please provide a detailed description of the process or processes which generated the materials in this container.
- b. Describe the contents of this container observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of this container.
- d. If a "waste determination" and "LDR determination" were made for the contents of this container, state when such determination was made.
- e. Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste in this container.
- f. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
- g. Was this container shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
- h. If this container was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of this container.

9. While inspecting the Quality Control Laboratory area, the inspector observed a steel container just outside of the Quality Control Lab. The container was labeled as hazardous waste and marked as "QC LAB". An accumulation start date was not observed on this container. (see Photographs 24 & 25) With regard to this container:

- a. Please provide a detailed description of the process or processes which generated the material in this container.
- b. Describe the contents of the container observed during EPA's April 2005 CEI, and provide the basis for your knowledge of such contents.
- c. State whether a "waste determination" and "LDR determination" was made for the contents of this container.
- d. If a "waste determination" and "LDR determination" were made for the contents of this container, state when such determination was made.

- e. Were the materials in this container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
 - f. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the waste, or on analytical results. If the determination was based on analytical results, provide any and all such results.
 - g. Was this container shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage or disposal?
 - h. If this container was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of this container.
10. With regard to the Facility's Hazardous Waste Training Program:
- a. It is EPA's understanding that the following persons at the Facility were responsible for the management of hazardous waste at the time of the April 12, 2005 CEI: Wayne Underwood, Sam Winkler, Steve Oser, Rudge Butterworth, Jerry Creamer, Sean Bumbalough, Steve Johnson, James Harrison, Arvin Petit, Wayne Powell, James Rice, Staley Hutton, Matt Gillespe and Lee Doyle. Please state whether or not the above understanding is correct. If the above statement is not accurate, please describe in detail your reasons as to why such statement is inaccurate and provide documentation supporting any assertion of inaccuracy.
 - b. If any other persons at the Facility, besides those listed in Request No. 10(a), above, are/were responsible for the management of hazardous waste for the period of April 12, 2005 up to the receipt of this letter, please provide the name of each such person. Persons responsible for the management of hazardous waste include, but are not limited to, those persons who label, date, and/or transfer containers of hazardous waste, sign manifests, conduct formal inspections of hazardous waste accumulation areas, fill out hazardous waste reports, and emergency coordinators.
 - c. During EPA's April 2005 CEI, documented job titles and job descriptions, revised January 4, 2001, were provided for the following employees: Wayne Underwood, Sam Winkler, Steve Oser, Jeff Reynolds, Ernie Johnson and Amy Egan. Please state whether or not the Facility has prepared documented job titles for Rudge Butterworth, Jerry Creamer, Sean Bumbalough, Steve Johnson, James Harrison, Arvin Petit, Wayne Powell, James Rice, Staley Hutton, Matt Gillespe and Lee Doyle. If so, please submit the Facility's documented job titles and descriptions for those employees and state the date such documents were prepared. If not, please state when the Facility expects to prepare such documents
 - d. State whether or not the Facility has documentation stating the amount of introductory and continuing training the Facility requires for those employees responsible for the management of hazardous waste. If so, submit the facility's **documentation of the type and amount of both introductory and continuing training**, that was in effect at the time of EPA's April 2005 inspection
 - e. Please state if hazardous waste training was provided to those employees listed above in Request No. 15(c). If so, please state the date(s) such training took place

and submit all RCRA training records the Facility has on file for those employees. In addition, be sure to include a detailed description of the training provided.

- i. If hazardous waste training has not been provided to those employees listed above in Request No. 15(c), please state when Akzo Nobel Coatings plans to provide such training.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____

Name: _____

Title: _____

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send your response to:

Mr. Jan P. Szaro (3WC31)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this matter, please contact Mr. Szaro at (215) 814-3421.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth G. Amend". The signature is fluid and cursive, with the first name "Kenneth" being the most prominent part.

for Carol Amend, Chief
RCRA Compliance and Enforcement Branch
Waste and Chemicals Management Division

Attachment: 4/12/05 Inspection Report

cc: Sam Winkler, Akzo Nobel Coatings Inc. (w/attachment)
Jan Szaro (3WC31)
Rodney Carter (3RC30)
Terri DiFiore (3WC31)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEDEX

Mr. James Bray
General Manager
Akzo Nobel Coatings Inc.
2837 Roanoke Avenue, S.W.
Roanoke, VA 24015

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Akzo Nobel Coatings Inc.
EPA ID No. VAD000019828
Reference No. C06-016

Dear Mr. Bray:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information to supplement the information obtained by EPA during the inspection of Akzo Nobel Coatings Inc., located in Roanoke, VA ("Facility") on April 12, 2005 and in response to Information Request (Reference No. C06-003). EPA is requesting this information pursuant to Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . ." EPA hereby requires that you provide EPA, within ten (10) calendar days of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original,

the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, recordings, discs, computer print outs, computer files, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266, 268, and 273 shall have the meanings set forth therein.

Requested Information

1. In the facility response to 1.a. of Information Request (Reference No. C06-003), the map entitled "Quality Control and Manufacturing Building" indicates that the drum outside of the Quality Control Lab is a 90 Day Storage Area. In response to 10.a. of the same Information Request, the drum outside of the Quality Control Lab is described as a satellite accumulation area.
 - a. Please clarify whether the facility considers the area where this drum outside of the Quality Control Lab is located as a 90 Day Storage Area or a Satellite Accumulation Area.
 - b. Please state the frequency with which wash solvent is generated in the Quality Control Lab.
 - c. Please state the frequency with which the wash solvent is added to the drum outside of the Quality Control Lab.
2. Section 2.f. of Information Request (Reference No. C06-003) requested documentation, as of April 12, 2005, to support that the ancillary equipment associated with the Main Hazardous Waste Storage Tank was fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050. The documentation provided in response was for the time period of May 2005 and on.
 - a. For the time period of July 2001, through and including April 2005, please provide documentation that the ancillary equipment associated with the Main Hazardous Waste Storage Tank was fulfilling the requirements of the air emission standards for equipment leaks as specified in 40 C.F.R. § 265.1050.
 - b. Please include a description of the testing procedure used in 2.a. Include an explanation of how facility personnel knew what components of the ancillary equipment were to be tested prior to said components being tagged after the April 12, 2005 EPA Compliance Evaluation Inspection (CEI).

3. In response to Section 11.a. of Information Request (Reference No. C06-003) the facility listed the following employees as having primary responsibility for hazardous waste at the time of the April 12, 2005 CEI:

Sam Winkler, HSE Manager
 Steve Oser, Waste Minimization Manager
 Wayne Underwood, Waste Coordinator
 Rudge Butterworth, Lab Porter

- a. From July 2001 until the present, please supply a list of all employees, past and present, who had primary responsibility for hazardous waste during this time period. Include the dates where they had this responsibility and each individual's job title.
- b. From July 2001 until the present, please supply sign-in sheets for any and all RCRA training sessions provided. Sign-in sheets were previously provided for training sessions conducted on April 29, 2005, December 17, 2004 and December 10, 2003. Of those previously submitted, only the sign-in sheets for the December 10, 2003 session needs to be resubmitted as only the first two pages had legible signatures in the first submission.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
 Name: _____
 Title: _____

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further

notice to you.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send your response to:

Mr. Jan P. Szaro (3WC31)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

If you have any questions concerning this matter, please contact Mr. Szaro at (215) 814-3421.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend, Chief
RCRA Compliance and Enforcement Branch
Waste and Chemicals Management Division

cc: Jan Szaro (3WC31)
Rodney Carter (3RC30)
Terri DiFiore (3WC31)

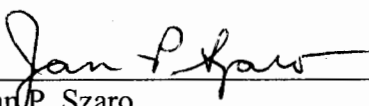
RCRA Compliance Evaluation Inspection

AKZO Nobel Coatings
2837 Roanoke Avenue, SW
Roanoke, VA 24015

RCRA Identification Number: VAD000019828
SIC Code: 2851

Date of Inspection: April 12, 2005

EPA Representatives:	Jan P. Szaro, Environmental Engineer RCRA Compliance & Enforcement Branch (215) 814-3421
	Martin Matlin, Environmental Scientist RCRA Compliance & Enforcement Branch (215) 814-5789
State Representative:	Elizabeth A. Lohman, Environmental Program Planner VA Department of Environmental Quality (540) 562-6799
Facility Representative:	Sam Winkler, Health Safety & Environmental Manager (540) 982-8301



Jan P. Szaro
Waste & Chemicals Management Division
June 15, 2005

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1.0 Introduction

On April 12, 2005, the United States Environmental Protection Agency, Region III (EPA), Waste and Chemicals Management Division, RCRA Compliance and Enforcement Branch (RCEB) conducted an unannounced Compliance Evaluation Inspection (CEI) under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 et seq. of AKZO Nobel Coatings – Roanoke, VA Plant. USEPA representatives Jan P. Szaro and Martin Matlin were accompanied by Elizabeth A. Lohman from Virginia's Department of Environmental Quality (VADEQ). The facility was represented by Sam Winkler, Health Safety and Environmental Manager.

The inspectors arrived at the facility at 9:10 AM on April 12th and announced their presence to the receptionist at the Office and Lab building who summoned Mr. Winkler. Mr. Winkler then conducted us to a conference room for the opening meeting. The inspectors presented their credentials and Mr. Szaro then explained the purpose of the RCRA Subtitle C inspection to be conducted at the facility. The inspection included an evaluation of the facility's coatings manufacturing processes, the handling/management of the waste streams generated during these processes and the facility's compliance with Federal and State hazardous waste regulations.

All information included in this report are the results of statements made by the facility representatives, materials shown to the inspectors by the facility representatives during the inspection, information and documents provided by the facility representatives to EPA during or after the inspection, and a review of the facility's EPA and State records. An EPA Generator Checklist was completed as part of the inspection and has been included as Attachment 1 to this report.

2.0 General Facility Information

2.1 Description of Facility

AKZO Nobel Coatings is located at 2837 Roanoke Avenue, SW, Roanoke, Virginia. The facility produces solvent and water based coatings. The primary end use for these products is as furniture finishes or kitchen cabinet coatings.

The facility originally began as Southern Varnish in the early 1920's. Reliance Universal bought the facility in 1959 and the facility became AKZO in 1989. AKZO had a merger in 1990 and became AKZO Nobel Coatings in 1991. The owner of the facility is AKZO Nobel Coatings which is headquartered in Arnhem, Holland. This facility is part of the High Point, North Carolina Consolidated Group.

The facility operates on a single shift five days per week. There are currently eighty-five (85) employees at the facility. Information concerning the area occupied by the facility was unavailable at the time of inspection. The facility is bounded by Union Street, Roanoke Avenue, Burks Street and a Norfolk & Western RR line. A map of the facility and a layout of the manufacturing areas is included as Attachment 2.

The Plant Manager at the facility is Mr. Emerson Schoonover. Mr. Winkler reports directly to the General Manager, Mr. James Bray. Mr. Winkler has been with the company for 26.5 years, 24 of which have been at this facility. He was an analytical chemist at this facility until 1991 whereupon he assumed his present position as Health Safety and Environmental Manager.

2.2 Compliance History

The Comprehensive Compliance Monitoring and Enforcement Report is included as Attachment 3. The State regularly conducts CEIs with regards to the Clean Air Act (CAA). The only previous RCRA Subtitle "C" CEI on record was conducted by the State on 8/27/92 in response to a citizen complaint regarding the report of Hazardous Waste being buried at the site. The State investigated further but could not confirm the presence of any buried Hazardous Waste onsite. The allegations have continued to be reiterated on a regular basis through the years and appear to be generated by an individual who is a former employee at the facility.

Violations determined as a result of the 8/27/92 CEI were that inspections were not being conducted of the Less Than 90-Day Lab Hazardous Waste Storage Area. There is no record of a resultant enforcement action.

3.0 Permit Status

Based on a review of the facility's manifests for 2001, 2002, 2003 and 2004, the AKZO Nobel Coating's Roanoke Plant is a Large Quantity Generator (LQG) of hazardous waste. The facility is not permitted to store, treat or dispose of hazardous waste and is therefore subject to the less than 90-day generator requirements under the VHWMR.

4.0 Process Description

The facility mainly manufactures coatings and finishes for the kitchen cabinet and wood furniture industries. The approximate breakdown by basis of the products is:

85% Solvent based
10% Water based
5% Ultra Violet (UV)

The UV products are off the mainstream of the other products in that they contain very little, if any, solvent. They are constituted mostly of a mixture of monomers and oligomers.

Manufacturing has five (5) main departments which are broken out into Stain, Paint, Lacquer, UV and Grinding. Refer to the map in Attachment 2 for the physical layout.

Products are made by batch processing technique. Essentially, the same process is used in each department. Different raw materials may be used and different process vessels may be used but it is still a batch mixing process. Raw materials are stored and weighed up on the mezzanine level. The solvents are hard-piped in from outside aboveground storage tanks to “headers” (Attachment 4, PHOTO 32) at the mezzanine level in each process department area. The pre-weighed raw materials are loaded into agitated mixing vessels according to proprietary formulae. The process then requires a certain amount of mixing time after which the batch is sampled and sent to Quality Control (QC). After QC approval, the batch is transferred and filtered (pumped through filter canisters that contain filter bag media (PHOTO 30)) and either drummed directly or sent to bulk tanker truck. Materials used such as filter bags and gloves are collected in a drum that will go out as hazardous waste. (PHOTOS 28,33, 35 & 36)

The vessel will usually then have solvent pumped in to clear the lines and clean the process vessel. The cleaning solvent is then collected in drums to be used in the next batch or reused for a subsequent cleaning. Effort is taken to campaign batches as much as is practicable, especially to try to limit the number of times a process vessel needs to be switched over from a solvent-based to a water-based product or vice versa. Drums of used cleaning solvent are labeled as “MISC”. These drums get analyzed and are moved to the “dirty thinner” area. Drums of cleaning solvent that can no longer be used are labeled as Hazardous Waste and taken to the Main Less Than 90-Day Storage Area where they are either pumped up to the Hazardous Waste Storage Tank or kept in drums to await shipment. The consistency of the material in the drum determines whether or not it is pumped into the Hazardous Waste Storage Tank. Wayne Underwood is the person in charge of transporting the drums from the manufacturing areas to the HW Storage Areas. Steve Ocer is in charge of the Waste Minimization Program at the facility and makes the determinations on the routing of HW generated at the facility after it has been analyzed.

5.0 Hazardous and Universal Waste Generation

Before beginning the inspection Mr. Winkler explained area where wastes are generated at the facility. The main source of HW is from the cleaning and filtering operations conducted in the five manufacturing areas. Specific mention was made of the following sources:

5.1 Hazardous Wastes

- **Spent Cleaning Solvents (Mfg)** – Spent solvents from vessel cleaning and line flushing that can no longer be used are brought to the Main Less Than 90-Day Storage Area and are mostly pumped up into the Hazardous Waste Storage Tank. A bulk shipment of approximately 6,000 gallons is

sent out every 5-6 weeks to the Giant Resource Recovery (GRR) facility in Arvon, VA. The transporter, MEI, is a subsidiary of GRR.

- **Off Grade Product** – Material that does not gain QC approval is collected in the “Work Off Area”. The facility will attempt to find a means to use this material in other batches. Material that is then found not to be usable in any fashion will then be labeled and dated as HW and moved to the Main Less Than 90-Day Storage Area. Mr. Winkler stated that the facility is very well aware of the Speculative Accumulation rules and they make sure to use at least 75% of the Work Off material annually.
- **Old Raw Materials** – Some raw materials, those that they especially use very slowly, can sit so long that they fall out of specification. These materials will then become HW.
- **Solidified Raw Materials** – These are mostly raw materials for the UV process, monomers and oligomers that do not have a long shelf life and solidify over time. When no longer usable, becomes HW.
- **Booms and Absorbents used in Spills** – These materials are collected in drums and sent to a GRR facility in South Carolina.

5.2 Universal Wastes

- **Used Lamps** – Mr. Winkler stated that used lamps are collected and stored in the Maintenance building. They are then shipped off to a facility in North Carolina.
- **Used Oil** – Mr. Winkler stated that the facility does not generate used oil.

6.0 Inspection Observations

6.1 Laboratory Wastes

Laboratories located in the Office and Lab building are as follows: (2 Water-based Labs, 2 Lacquer Labs, Physical Testing Lab, Paint Lab, UV Lab, Stain Lab & Workroom) Will discuss these operations a whole as the observations are similar in most respects.

In each Lab, such as the Water-based Lab (PHOTO 1), there is a closed container containing solvent such as acetone, methyl ethyl ketone, or methyl propyl ketone used for cleaning purposes. Either directly under or next to each unit a container is found collecting cleaning solvent that is no longer usable and that will be added to a HW drum in the Lab Less Than 90-Day HW Storage Bldg. In multiple instances this container is either not closed, not labeled or both (PHOTOS 6,9 &13). A screen is usually affixed atop each of these containers such that it is not even possible to effectively close these

containers. A Lab Porter, Rudge Butterworth, is in charge of the wastes generated by the Labs. In his absence, the Lead Man of each Departmental Lab assumes the responsibility for wastes generated in their area of responsibility. HW generated by the Labs are to be added to the drums in the Lab Less Than 90-Day Storage Area on a daily basis.

6.2 Mercury Waste – In the Physical Testing Lab a 5 gallon container was observed with thermometers protruding from an open spout (PHOTO 5). The container was labeled as HW and was also identified as Mercury Waste. The facility representative informed us that these were broken thermometers that could have come from any of the Labs. They were not generated in this Lab, just stored here. In the past broken thermometers were taken by a student who worked there and was able to get Virginia Tech to take the broken thermometers. That person has not worked at this facility for 3-4 years and they do not currently have a means of disposing of this waste.

6.3 Lab Less Than 90-Day Storage Area - There is no sign present (PHOTO 18) identifying this building as a Less Than 90-Day Area. An Emergency Contact list was also not present at this building.

Two drums (PHOTO 16) were found currently in use for the collection of HW. They were closed and labeled and dated 3/28/05 and 3/31/05. Rudge Butterworth is to bring these drums, when filled, to the Main HW Storage Area where they are to be pumped up into the HW Storage Tank if the viscosity of the material allows. Many open containers which held product samples or raw materials (PHOTOS 15 & 17) were observed. Mr. Winkler stated that these are materials left to dry out. When dried out, the cans are disposed of in the regular trash.

6.4 Quality Control Lab & Product Test Labs Wastes - This building is located across the street from the Office & Lab building and has an alley that runs between it and the Main Manufacturing Building. Multiple rooms are filled with shelving that contain sample retains and standards dating back as far as 2000. Andy Eckert, QC Manager, informed us that standards are usually turned over every 6 months but that infrequently manufactured products might well have standards kept for a much longer time frame. The inventory is sorted through twice a year, samples removed are then disposed of as HW.

Spraying of product is performed in the Product Test Lab. The spray gun is cleaned by spraying solvent into a filter. The filter is then left to dry and is disposed of in the regular trash. Same type of operation is conducted in the UV Lab (PHOTO 11) in the Main Lab. In the Product Test Lab, a container was found (PHOTO 23) containing rags and filters from the spraying operation. The container was not labeled in any form.

The facility representative stated that HW is removed from the building on a daily basis to a satellite container in the Main Manufacturing building. Just outside the QC Lab that opens onto the alley between the Lab and the Main Mfg building a container was found. (PHOTO 24) This container was labeled as Hazardous Waste and was also marked as "QC Lab". The container was found to be about 25% full with material

exhibiting a strong solvent odor. The container was undated and found to be out-of-round such that the cover did not effectively close the container. The facility representative could not explain this container's existence. PHOTO 25 shows the location of this container. Door to the Lab is just outside of the picture to the left.

Many raw material containers, some where the containers look to be in distress (PHOTOS 26 & 27), were also observed in this alley. Mr. Winkler stated that these were good raw materials still used in manufacturing

6.5 Manufacturing Spent Cleaning Solvents - Spent solvent is created by vessel cleaning and line flushing. This material is collected in 55 gallon containers in each department. These drums were found to be labeled and closed. The cover of this type of drum in the Paint Department had a loose fitting cover (PHOTO 34) on the funnel.

HW is also generated by the parts cleaning operation in each department. The Stain Dept. operation is shown in PHOTO 31. The two 5 gallon containers pictured contain solvent for parts cleaning. They are still active and will be added to a HW container when they are no longer useful.

6.6 Manufacturing Solid Wastes – These wastes are mostly generated by the filtering process (PHOTO 30) and from clean ups after vessel cleaning (PHOTO 29). The filtering process causes the generation of used filters, gloves and rags. These are collected in containers as shown in PHOTOS 28, 33, 35 & 36) The container in each of these instances is not labeled or is only labeled as “Filter Drum” or “Dirty Bag Filters”. Vessel cleaning or filtering often leaves material on the floor. This material is cleaned up with booms or absorbent material and added to the solid waste container.

6.7 Hazardous Waste Storage Tank – There is a 10,700 gallon Hazardous Waste Storage Tank at the facility. A tank integrity assessment performed by a Professional Engineer (Attachment 5) was made available to the inspectors. The tank, installed in 1986, appeared to be in good shape and was inside a secondary containment area. A crack in the containment wall that extends from top to bottom of the wall and appears to be through the entire thickness of the wall was observed (PHOTOS 50 & 51). HW is pumped up into the tank from containers by pump (PHOTOS 42 & 47) A separate pump inside the containment wall is utilized to pump the HW out of the tank to bulk tanker truck. No identification markings were observed on the pumps or associated piping used to transfer the HW. (PHOTOS 42,47,48 & 49)

6.8 Product Work-Off Area – There are two work-off areas, a small area that shares the same concrete pad as the Main Less Than 90-Day Storage Area and a large area that held in excess of 300, 55 gallon containers. There was a pallet of 35, 5 gallon containers (PHOTO 55) at the small work-off area that the facility representative could not identify, either as to content or disposition. A 55 gallon container (PHOTO 54) was also observed in this area. The container was closed. It was not dated and only identified as “LAC BAGS”. The facility representative stated that this container should be labeled “Hazardous Waste” and moved to the Less Than 90-Day Storage Area.

The large work-off area is where out of spec product and old raw materials are stored. (PHOTOS 52 & 53) Materials are stored here until determination is made by the Waste Minimization Manager, Steve Ocer, on whether the materials can be used. Mr. Ocer maintains a monthly report, "75% Rule Monthly Report" (Attachment 6) to ensure that at least 75% of this material is used annually.

6.9 Main Less Than 90-Day Storage Area – Area is pictured in PHOTO 42. Drums generated throughout the facility, including from the Lab Less Than 90-Day Storage Area are assembled here. Containers that have used solvents and are thin enough are pumped up into the HW Storage Tank. Containers where the HW is not pumpable and the solid HW containers are stored here prior to shipment. No containers were found with a date that was 90 days old or older.

Four 5 gallon containers (PHOTO 43) were observed that were not dated and only one of the four was labeled. Three other 5 gallon containers (PHOTOS 44 & 45) were observed as not being closed, but were labeled and dated. A burlap bag of material (PHOTO 46) was also observed.

7.0 Records Review

7.1 Manifests

Manifests for the calendar years 2001, 2002, 2003, 2004 & 2005 were reviewed as part of this inspection. Based on the manifests and confirmed by the biennial reports, the AKZO Nobel Coatings Roanoke Plant would be categorized as a Large Quantity Generator of hazardous waste. The facility's manifests were mostly in good order. Many weight discrepancies were noted. Mr. Winkler explained that the facility does not have a scale and estimates the weights when shipping by bulk carrier. One manifest of the many observed, Document # 03771, shipment to GRR facility on 9/16/03, did not have a copy with the receiving facility's signature. One other manifest, Document # 32197, shipment to Southeastern Chemical & Solvent on 9/27/04, had a waste determination correction. AKZO had shipped 13 drums of the shipment as Non-Regulated (water-based coating). The receiving facility determined that 6 of the drums tested as HW for acetone and toluene. The two manifests and the discrepancy report are included as Attachment 7.

7.2 Inspection Logs

Logs for the Hazardous Waste Storage Tank and for each of the two Less Than 90-Day Storage Areas were found to be complete and up to date.

7.3 Training

Mr. Winkler conducts the training at the facility. He has been at this facility for 24 years with much experience. Documents not available for training that has been conducted. He has not been receiving annual training for several years. Job descriptions observed for selected personnel were adequate but were from 2001. Attachment 8

7.4 Contingency

The facility's plan was reviewed and appeared to meet the regulatory requirements.

8.0 Closing

Areas of concern raised are as follows:

- 1) Pumps and piping used for Hazardous Waste are not identified or monitored.
- 2) Cracks in the secondary containment area of the HW tank.
- 3) Containers in the Main Less Than 90-Day Storage Area that are unlabeled, undated or not closed or some combination thereof.
- 4) No identification sign at the Lab Less Than 90-Day Storage Area indicating it as such
- 5) Container labeled "LAC BAGS" in the main work-off area that the facility representative stated should be Hazardous Waste
- 6) Containers throughout manufacturing areas holding solid waste not labeled as HW or only labeled as "Filter Drum" or "Dirty Bag Filters"
- 7) Several of the containers mentioned in 4) are not kept closed
- 8) Container labeled as HW and "QC LAB" that the facility representative could not identify. The drum is outside, not in the area where the waste is generated.
- 9) The many open and in some cases, unlabeled, containers of waste solvents observed throughout the Lab areas.
- 10) Mercury waste observed in an open container in the Physical Testing Lab
- 11) Lack of documentation that HW training was conducted
- 12) Person conducting the HW training does not receive annual training
- 13) (1) manifest without a TSD signed copy
(1) manifest with waste determination discrepancy

Mr. Winkler sent a response to the Closing that was received on 4/18/05. It is included as Attachment 9.

9.0 Attachments

1. EPA Generator Checklist
2. Facility Map & Safety Information
3. Comprehensive Compliance Monitoring & Enforcement Report
4. Photographic Log
5. Hazardous Waste Storage Tank Integrity Assessment
6. Facility 75% Rule Monthly Report
7. Manifest Documents # 03771 & 32197 and discrepancy report for # 32197
8. Hazardous Waste Job Descriptions for selected personnel
9. 4/18/05 response from Mr. Winkler

ATTACHMENT 1

EPA GENERATOR CHECKLIST

Name of Facility: AKZO NOBEL COATINGS

Address of Facility: 2837 ROANOKE AVE, SW

ROANOKE, VA 24015

EPA I.D. Number: VAD000019828

Name/Title of Facility Representative: SAM WINKLER

Health, Safety & Environmental Mgr.

I. General

1. Provide a brief description of the type of operation(s) that produces hazardous waste at this facility:

Manufacture of solvent based coatings & finishes.
Line, flushing, vessel cleaning, off grade product, old
raw materials, lab R&D & testing.

2. Does the facility perform the following on-site:

a. storage (>90 day or >180 day for SQG) of hazardous waste? yes no

b. treatment of hazardous waste? yes no

c. disposal of hazardous waste? yes no

(if yes, complete appropriate TSD checklists)

261.4

3. Is the facility subject to any exclusions for its hazardous waste? yes no

If yes, list the waste and the basis for exclusion:

262.11(c)

4. Has the facility properly determined whether all of its waste exhibits any of the characteristics of hazardous waste?

yes no

If yes, describe what this determination was based upon (i.e., testing or knowledge of process/materials used).

Knowledge of process, G.C. testing of questionable materials

If no, describe omissions:

5. Has the facility failed to notify EPA/State of any of its hazardous waste management activities, including locations of all hazardous waste accumulation areas? yes no

If yes, describe: _____

II. Manifest

Complete this section only if facility ships hazardous waste off-site.

262.20(a)

1. Does the facility use the Uniform Hazardous Waste Manifest whenever transporting hazardous waste? yes no

If no, explain: _____

If yes, review a representative number of manifests and indicate whether they contain:

a. Generator's name, mailing address, telephone number and EPA ID number? ☒ yes ☐ no

b. Transporter's name and EPA ID number? ☒ yes ☐ no

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number?
☒ yes ☐ no

d. Number and type of containers (if applicable)?
☒ yes ☐ no

e. Quantity of each waste transported? ☒ yes ☐ no

f. Name, EPA ID number and site address of facility designated to receive the waste? ☒ yes ☐ no

g. The following certification? ☒ yes ☐ no

"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a)

2. Did the generator:

a. Sign and date the manifest? ☒ yes ☐ no

b. Obtain the handwritten signature and date of acceptance from the initial transporter? ☒ yes ☐ no

c. Ensure that return copies of the manifest from the designated TSD facility were properly signed and dated?
yes ☒ no

One manifest not signed

d. Retain a copy of the signed manifest for at least three years? yes no

The inspector should obtain copies of any manifests that are found to have problems.

III. Pre-Transport Requirements

Complete this section only if the facility ships hazardous waste off site.

1. Is there any indication that the facility is:

262.30

a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)?
yes no

262.31

b. Not labelling each package in accordance with DOT regulations (49 CFR Part 172)? yes no

262.32(a) & (b)

c. Not marking each container of 110 gallons or less with the words "hazardous waste ----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? yes no

If yes, explain: _____

262.33

2. Does the facility placard or offer the transporter placards for its hazardous waste shipments? yes no

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? yes no

b. Less than 90 day storage? yes no

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c) (1)

2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? yes no

If no, describe: Drum that QC Lab said did not exist was outside, Maint. workers using SAAs in other locations.

262.34(c) (1)

3. Are there multiple satellite accumulation areas for any one process that generates hazardous waste? yes no

If yes, describe: Facility is a batch maker & has many process vessels that produce similar waste

262.34(c) (1)

4. Is the waste stored in container(s)? yes no

265.171

5. Are container(s) in good condition? yes no

If no, explain: QC Lab 55 gal container was out of round, cover could not be fitted.

262.34(c) (1)

6. Are container(s) marked with the words "hazardous waste" or the actual contents of the container(s)? yes no

Some exceptions

265.173(a)

7. Are container(s) kept closed? yes no
Solid waste drums in mfg. & solvent buckets in Labs

265.171

8. Are any container(s) leaking? yes no

If yes, describe: _____

262.34(c)(1)

9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? yes no

If yes:

262.34(c)(2)

a. Are the container(s) holding excess waste dated as to when accumulation began? yes no

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? yes no

Answer the following questions if the facility has less than 90 day storage.

262.34(a)(4)

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? yes no

Lack of personnel training documentation

If yes, do these records include:

265.16(d)(1)

a. Job title for each position related to hazardous waste management and the employee filling each job?

yes no

265.16(d)(2)

b. A written job description for each position?

yes no

265.16(d)(3)

c. A written description of the type and amount of training that will be given to each person?

yes no

265.16(d)(4)

d. Records that document that the training or job experience required by facility personnel to effectively respond to emergencies and otherwise manage hazardous waste in a proper manner has been successfully completed?
yes no

265.16(b)

11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? yes no

265.16(c)

12. Do facility personnel take part in an annual review of the initial training requirements and update them as necessary?

yes no
but no documentation available

262.34(a)(4)

13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR Part 265 Subpart C?

yes no

Is the facility equipped with:

265.32(a)

a. Internal communications or alarm system? yes no

265.32(b)

b. Telephone or hand-held two-way radio? yes no

265.32(c)

c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? yes no

265.32(d)

d. Adequate volume of water? yes no

265.33

14. Does the facility test and maintain the above equipment to assure its proper operation? yes no

265.35

15. Is there sufficient aisle space to allow the unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of an emergency? yes no

265.37(a)(1)

16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility?

yes no

262.34(a)(4)

17. Has the facility prepared a contingency plan and is it maintained at the facility? yes no

If yes, does it contain the following:

265.52(a)

a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? yes no

265.52(c)

b. Description of arrangements made with local authorities? yes no

265.52(d)

c. Current list of emergency coordinators' names, addresses and phone numbers (office and home)? yes no

265.52(e)

d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? yes no

265.52(f)

e. evacuation plan for facility personnel? yes no

The inspector should obtain a copy of the facility's contingency plan if any problems are found.

265.53(b)

18. Were copies of the contingency plan submitted to local authorities that may provide emergency services? yes no

19. Has the facility's contingency plan ever failed in an emergency? yes no N/A

If yes:

265.54(b)

a. Was the contingency plan immediately amended?
yes no

265.54(c), (d) & (e)

20. Was the contingency plan amended when either the facility or its operations, list of emergency coordinators or list of emergency equipment had changed? yes no N/A

If no, describe: _____

265.56(j)

21. If the contingency plan is implemented, does the facility record the time, date and details of the incident in its operating log and submit a written report of the incident to the Regional Administrator or the appropriate state agency within 15 days? yes no N/A

262.34(a)(1)

22. What is the method of waste storage:

Containers? yes no

Tanks? yes no

Containment Buildings? yes no

Other? yes no

If other, describe: _____

Answer the following questions if the facility uses container storage.

262.34(a)(2)&(3)

23. Are the container(s) marked with the words "Hazardous Waste" and the date that waste accumulation in that container begins? yes no *Some exceptions*

262.34(a)

24. Based upon accumulation dates, have any container(s) been in storage for more than 90 days? yes no

If yes, the inspector should complete the appropriate TSD checklists.

265.171

25. Are container(s) in good condition? yes no

If no, explain: QC Lab drum is set of round & can't be closed.

265.172

26. Are container(s) made of or lined with materials which will not react with or be incompatible with the waste they are storing? ☒ yes ☐ no

265.173(a)

27. Are container(s) kept closed? yes ☒ no Solid waste drums in mfg
Solvent buckets in labs

265.173(b)

28. Are containers(s) opened, handled or stored in a manner which may rupture the container or cause it to leak?
yes ☒ no

If yes, describe: _____

265.171

29. Are any container(s) leaking? yes ☒ no

If yes, describe: _____

265.174

30. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained?
☒ yes ☐ no

If no, explain: _____

265.176

31. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? ☒ yes ☐ no N/A

32. Are incompatible wastes placed in the same container(s)?
yes ☒ no

If yes:

265.177(a) & 265.17(b)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred? yes ☐ no

If yes, describe: _____

265.177(c)

33. Are container(s) holding incompatible hazardous waste properly separated or protected from one another while in storage? yes no N/A

If no, explain: _____

Answer the following questions if the facility uses tank storage.

262.34(a)(3)

34. Is the tank(s) labelled or clearly marked with the words "Hazardous Waste"? yes no

262.34(a)

35. Is the tank marked with the date that waste accumulation begins in that tank(s) or does the facility have in its records when waste accumulation started in that tank(s)?

yes no

262.34(a)

36. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for longer than 90 days?

yes no

If yes, the inspector should complete the appropriate TSD checklists.

37. Which of the following describes the type of tank(s) employed at this facility (circle the appropriate one)?

- a. Indoor - not on impermeable floor
- b. Indoor - on impermeable floor
- c. Outdoor - above ground
- d. Outdoor - in ground
- e. Outdoor - underground

38. What is the approximate age of the tank(s)?

19 years

265.191

39. Does the tank(s) appear to be in good condition?

yes no can't tell

If no, describe: _____

265.191

40. Is the tank(s) leaking? yes no can't tell

If yes, describe: _____

265.193

41. Is the tank(s) provided with an effective secondary containment system? yes no

If yes, describe: Observed one crack in the containment.

If no:

265.191(a)

a. Does the facility have a written assessment reviewed and certified by an independent, qualified, registered professional engineer that attests to the tank(s)'s structural integrity? yes no

265.191(b)

42. Was a leak test performed on the tank(s)? yes no

If yes, provide date of most recent test: _____

265.194(b)

43. Is the tank(s) provided with adequate controls to prevent spills and overflows (i.e., automatic feed cutoff, bypass to another unit, high level alarms, etc.)? yes no

265.194(b)

44. Is there sufficient freeboard (2 feet) in uncovered tanks to prevent overtopping by wave or wind action or precipitation? yes no N/A

265.195(a)

45. Is the tank(s) inspected each operating day? yes no

If yes, do inspections include:

265.195(a) (1)

a. Overfill/spill control equipment? yes no

265.195(a) (2)

b. Aboveground portions of the tank(s) for corrosion or releases? yes no N/A

265.195(a) (3)

c. Data gathered from monitoring equipment and leak detection equipment? yes no

265.195(a) (4)

d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion or releases? yes no N/A

265.195(b) (1)

46. Does the facility perform annual inspections of the cathodic protection systems, if present?
yes no N/A

265.195(c)

47. Does the facility properly document all of the results of its tank system inspections? yes no

265.196

48. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank from service immediately, failure to provide notification, etc.)? yes no

If yes, describe: _____

49. Does the facility store any ignitable or reactive waste in its tank(s)? yes no

If yes:

265.198(a) (1)

a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? yes no

265.198(a) (2)

b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? yes no

265.198(a) (3)

c. Is the tank(s) used solely for emergencies?
yes no

265.198(b)

d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares?
yes no

If no, describe: _____

50. Is there any indication that incompatible wastes are being stored in a tank(s)? yes no

If yes:

265.199(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxics emissions occurred? yes no

If yes, describe: _____

265.200(a)

51. Are waste analyses or trial treatment tests conducted whenever a tank system is used to store or treat a hazardous waste substantially different from waste previously treated or stored; or used to treat chemically a hazardous waste with a substantially different process than any previously used in that system? yes no N/A

If no:

265.200(b)

a. Has written, documented information on similar waste under similar operating conditions been obtained to show that the proposed treatment or storage will meet the requirements of §265.194(a) (i.e., hazardous waste or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment or the secondary containment system to rupture, leak, corrode or otherwise fail)? yes no

Answer the following questions if the facility uses containment buildings as a storage unit.
(effective February 18, 1993)

265.1101(a) (1) & (2)

52. Is the containment building(s) completely enclosed and designed and constructed of man-made materials that are of sufficient strength? yes no

If no, describe: _____

265.1101(a) (3)

53. Is there any indication that incompatible waste is being improperly stored in the containment building? yes no

If yes, describe: _____

265.1101(a) (4)

54. Does the containment building(s) have a primary barrier that appears to be sufficiently durable and effective?
yes no

If no, describe: _____

55. Does the containment building manage hazardous waste containing free liquids? yes no

If no, skip to question 58:

265.1101(b) (2)

56. Is there a liquid collection and removal system available to prevent the accumulation of liquid on the primary barrier?
yes no

If yes, describe the system and the presence/absence of collected liquids: _____

265.1101(b) (3)

57. Is there an effective secondary containment system (i.e., secondary barrier) and a leak detection system capable of detecting failure of the primary barrier? yes no

If no, describe: _____

58. Does the containment building serve as secondary containment for tank(s) placed within the building?
yes no

If yes,

265.1101(b) (3) (iii)

a. Does it appear to meet the secondary containment system requirements for tanks described in §265.193 (i.e., must be compatible with waste, have sufficient strength and durability, and be designed to effectively detect and collect releases of liquid)? yes no

If no, describe: _____

265.1101(c)(1)(i)

59. Is the primary barrier free of significant cracks, gaps, corrosion or other deterioration/openings? yes no

265.1101(c)(1)(ii)

60. Is the hazardous waste stored at a height that exceeds the height of any containment wall? yes no

265.1101(c)(1)(iii)

61. Is any hazardous waste tracked outside of the containment building by personnel or equipment? yes no

265.1101(c)(1)(iv)

62. Are any fugitive emissions exiting the containment building via doors, windows, cracks, vents, etc? yes no

265.1101(c)(2)

63. Does the facility have a certification for the containment building by a qualified registered professional engineer?
yes no

64. Does the facility have an inspection plan for its containment building that establishes an effective inspection program, including a schedule that requires all monitoring/leak detection equipment to be inspected as well as checks for leaks/releases at least every 7 days? yes no

265.1101(c)(3)

65. Is there any indication that the containment building was improperly operated or maintained or that the owner/operator did not respond properly once the detection of a hazardous waste release occurred? yes no

If yes, describe: _____

262.34(a)

66. Does the facility have written documentation showing that procedures are in place to ensure that individual additions and removals of waste to/from the containment building are consistent with the 90 day storage time limit that applies for all wastes managed in the unit? yes no

If waste is being stored in a containment building for greater than 90 days, the inspector should complete the appropriate TSD checklist.

V. Recordkeeping and Reports

262.42((a)(2))

1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? yes no

If yes, does the Exception Report include:

a. Legible copy of the manifest? yes no

b. Cover letter explaining generator's efforts to locate waste and the results of those efforts? yes no

262.41(a)

2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by March 1 of each even numbered year?

yes no N/A

If yes, does the Biennial Report include:

262.41(a)(3)

a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year?

yes no

262.41(a)(4)

b. Name and EPA ID number of each transporter used during the year? yes no

262.41(a)(5)

c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? yes no

d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated?

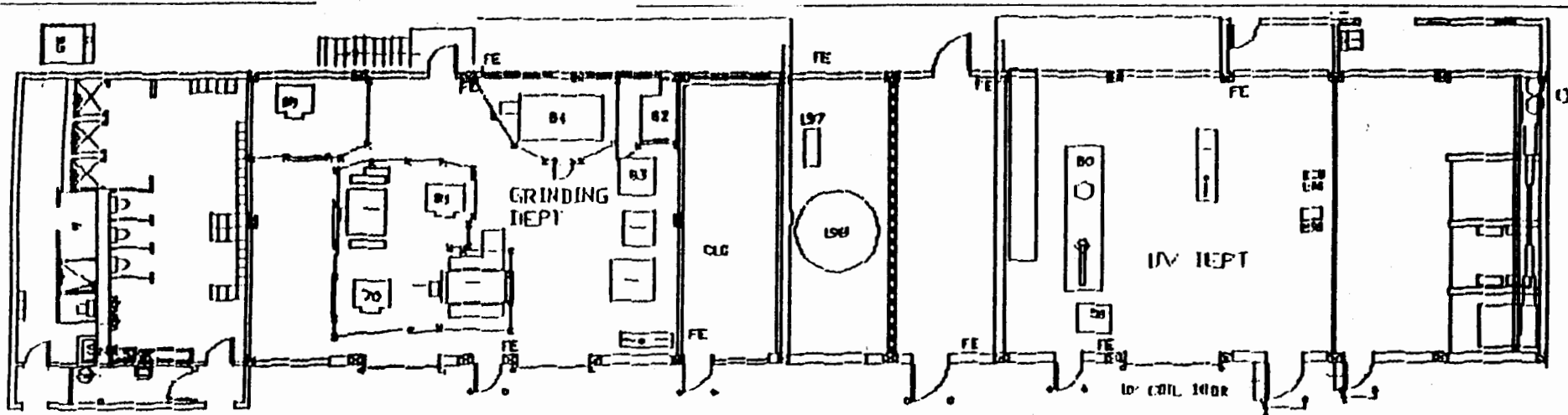
e. Description of the changes in volume and toxicity of the waste actually achieved during the year?

3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analyses for a minimum of 3 years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal?

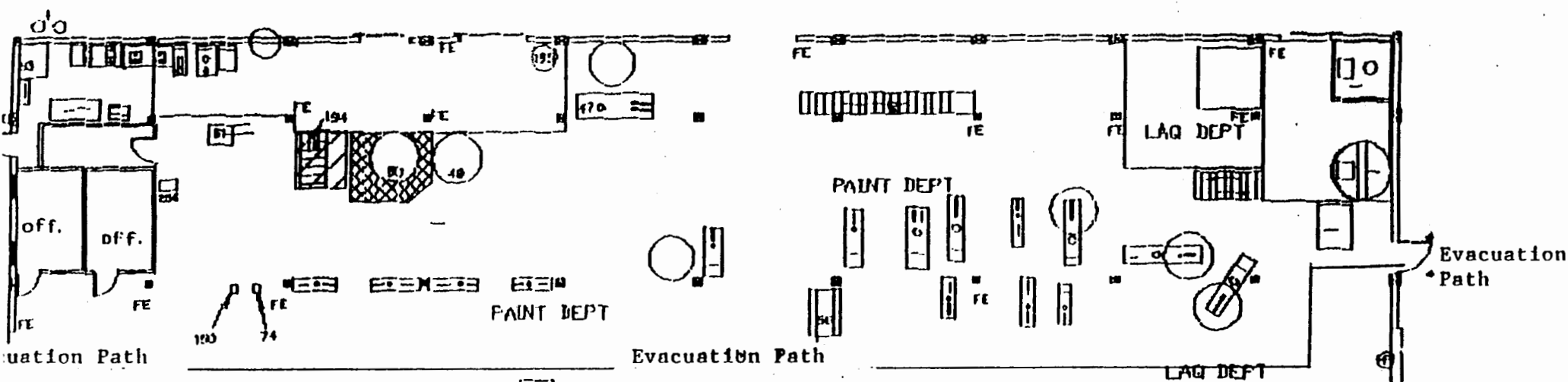
A d d i t i o n a l C o m m e n t s :

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page or a sheet of stationery. The edges of the paper are slightly irregular, suggesting it might be a scan of a physical document. There is no handwriting or other markings on the page.

ATTACHMENT 2



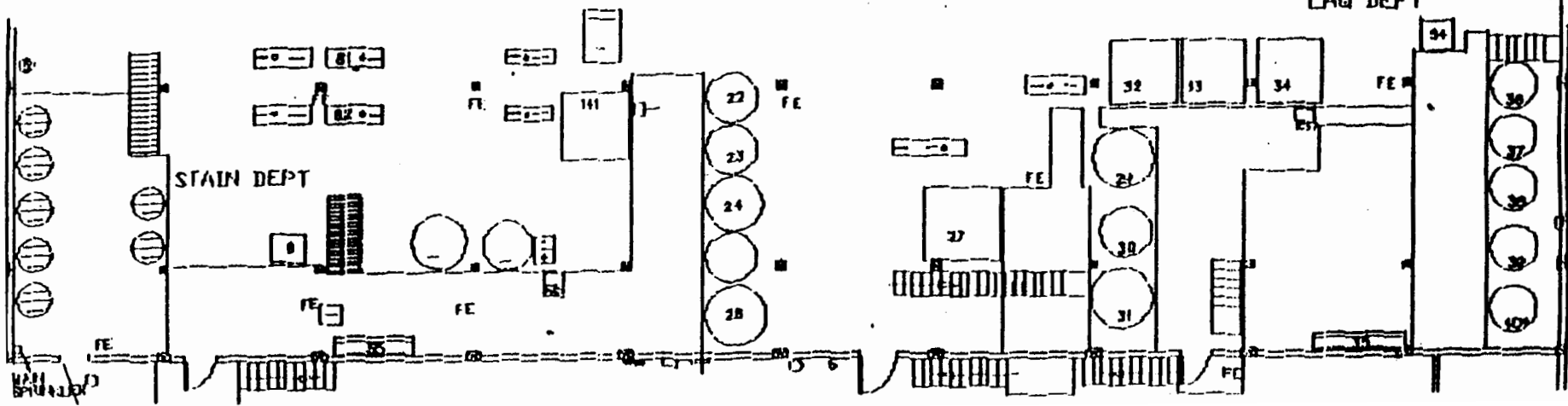
Evacuation Path



Evacuation Path

Evacuation Path

Evacuation Path



Safety Rules

1. Safety glasses must be worn in all areas of the site.
2. Visitors are to be escorted by an Akzo Nobel employee
3. Do not touch product or equipment
4. Watch for forklifts and other moving equipment
5. Any injury shall be reported immediately to the responsible person in the area
6. No cameras inside the plant
7. No person shall be under the influence of , use or have possession of alcohol, drugs, or weapons on plant premises
8. Members of management reserve the right to ask anyone to leave the facility if that person fails to comply with any of these rules
9. We maintain material safety data sheets on all of our chemicals.
10. Do not walk under suspended loads
11. Open flames or use of spark generating equipment is prohibited. Smoking is only allowed in areas that are designated as such.

EVACUATION PROCEDURE

1. An activated alarm is the signal to evacuate the plant
2. Evacuate the plant by exiting the nearest designated exit door, and proceed to the parking lot nearest you
3. Notify the evacuation coordinator that you are a guest and give them your name

4. Remain there and await further instructions.
5. Do not attempt to enter the plant until the all clear signal is given.

The concern for health, safety, and environmental issues forms an integral part of Akzo Nobel's business policy. Akzo Nobel actively supports the guiding principles of the Coatings Care program of the United States paint and coatings industry.

During your visit to the plant, please remember that you also have a responsibility for safety. Safety glasses are required in all production areas. Smoking is permitted only in designated areas. Give right of way to forklift traffic. Remain alert at all times to what is happening around you. In areas of maintenance or construction, obey all yellow tape. Don't walk under suspended loads.

Review your surroundings and where you are in the plant. In the unlikely event of an evacuation a fire alarm will sound. Proceed immediately to an evacuation coordinator.

Thank you and enjoy your visit.

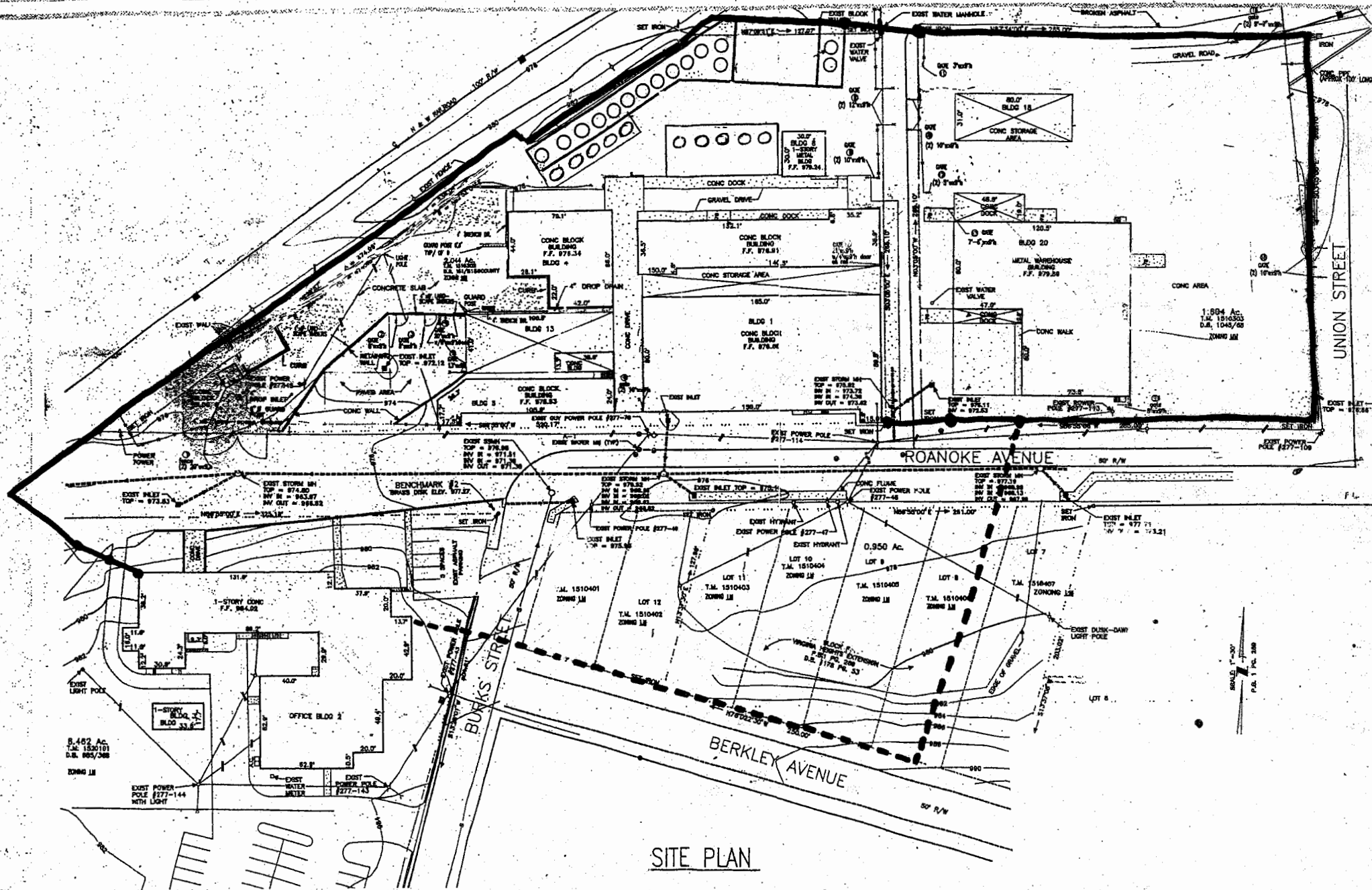


AKZO NOBEL

VISITORS'S GUIDE TO SAFETY

PLANT AREA

**Akzo Nobel Coatings
2837 Roanoke Avenue S.W.
Roanoke, VA 24015
(540)982-8301**



ATTACHMENT 3

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: June 15, 2005 - 3:01 PM

Version: 2.0

User Selection Criteria

Location:	Virginia	Evaluation Date Range:	10/01/1990 To 06/15/2005
Group of IDs:	Not Selected	Only Evaluations with Violations:	No
Handler Name:		Federal facilities only:	No
Handler ID:	VAD000019828	Reason Code:	All
Universe:	All	Display Code Descriptions:	Yes
Sort Order:	Region, State, Handler Name		

Results

Data meeting the criteria you selected follows.

Total Pages: 4

Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in the respective sections for evaluations and violations. Violation coverage areas are shown horizontally across the page in the evaluation data section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name:	cmecomp.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date:	November 2002
Last Updated:	August 2004
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmecomp, cevaluation_area, hreport_univ, aarea, aln_area_event, aevent, gpri_ca, lu_state, hid_groups
Libraries:	cmedec2.pll

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: June 15, 2005 - 3:01 PM

This report may contain enforcement sensitive data.

AKZO NOBEL COATINGS

Activity Location: VA

VAD000019828

Location: 2837 ROANOKE AVE. SW
ROANOKE, VA 24015

Mailing: 2837 ROANOKE AVE. SW
ROANOKE, VA 24015

County Name/Code: ROANOKE CITY/VA770

State District: 2

Accessibility:

Non-Notifier:

Extract Flag: Y

Universes

Generator: LQG
Transporter:

Full Enforcement: ----
Operating TSDF: ----
BOYSNC:
SNC:
Annual BOY Enf:

Subj CA:
Subj CA TSD 3004:
Subj CA TSD Discr:
Subj CA Non-TSD: X
CA Wrkld:

Perm Prgrs: ----
Perm Wrkld: ----
Clos Wrkld: ----
Pclos Wrkld: ----

Op Pmt GPRA:
PClos GPRA:
CA GPRA:
CA HE EI:
CA GW EI:

CEI Evaluation 08/27/1992 Act Loc: VA By: State Seq #: 000 Person: VAREF Branch: Reason: 04 Found Violation: Y

Notes: INVESTIGATED A CITIZENS COMPLAINT

Coverage Areas: GER GGR GLB GMR GPT GRR GSC

Violation Data									Enforcement Data						
Act Loc	C L	P R	Res Type	Determined Branch	Sched Date	Actual Compliance	Seq #		Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per
VA	2		GER	VAREF ER	08/27/1992	09/27/1992	10/09/1992	S0003	VA	10/02/1992	120	000		S	R3REF
Viol. Notes: FAILED TO PERFORM INSPECTIONS OF A HAZ. WASTE STORAGE AREA															
VA	2		GRR	VAREF ER	08/27/1992	09/27/1992	10/09/1992	S0004	VA	10/02/1992	120	000		S	R3REF
Viol. Notes: INSPECTION LOG FOR HAZ. WASTE ACCUM. IN THE LAB SHED WAS NOT MAINTAINED															

CEI Evaluation 01/23/1991 Act Loc: VA By: State Seq #: 003 Person: Branch: Reason: Found Violation:

Notes:

Coverage Areas: GER GLB

Violation Data									Enforcement Data						
No Violations									No Enforcements						

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

Comprehensive Compliance Monitoring and Enforcement Report

Page 3

Report run on: June 15, 2005 - 3:01 PM

This report may contain enforcement sensitive data.

Description of codes used on the report:

Universes	Description Of Universes
Operating tsdf	Indicates that the facility is a treatment, storage or land disposal facility subject to any type of enforcement. Then specifies type facility (see LIBST below for further explanation).
PCWrklid	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Post-Closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
ClosWrklid	Indicates that the facility is a treatment, storage or land disposal facility which is part of the closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
Perm/PC	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permitting/Closure/Post-Closure Progress universe. It is then specifies type of facility (see LIBST below for further explanation).
PermWrklid	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permit Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
SubjCA	Indicates that the facility is subject to Corrective Action. ('X' indicates that the facility is in this universe).
CAWrklid	Indicates that the facility is part of the Corrective Action Workload universe. ('X' indicates that the facility is in this universe).
LQG	Indicates that the facility is a Large Quantity Generator. ('X' indicates that the facility is in this universe).
SQG	Indicates that the facility is a Small Quantity Generator. ('X' indicates that the facility is in this universe).
CESQG	Indicates that the facility is a Conditionally Exempt Small Quantity Generator. ('X' indicates that the facility is in this universe). Note: CESQG are not nationally required to notify or obtain an EPA ID. Therefore, the absence of CESQG data for any given state or facility does not indicate a data quality problem.
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('X' indicates that the facility is in this universe).
SNC	Indicates that the facility is a Significant Non-Complier. ('X' indicates that the facility is in this universe).
BOYSNC	Indicates that the facility was a Significant Non-Complier at the beginning of the fiscal year: Oct 1- Sep 30. ('X' indicates that the facility is in this universe).
LIBST in the above universes indicates:	
L	Land Disposal facility
I	Facility is an Incinerator
B	Facility is a Boiler or Industrial Furnace (BIF)
S	Storage facility
T	Treatment facility

Comprehensive Compliance Monitoring and Enforcement Report

Page 4

Report run on: June 15, 2005 - 3:01 PM

This report may contain enforcement sensitive data.

Description of codes used on the report:

ACT LOC
Act Loc indicates the activity location where the evaluation/inspection was performed, the violation was discovered or the enforcement action was taken.

Agency indicates the agency performing the evaluation or the enforcement action:	
X-EPA	EPA region performed the evaluation or enforcement action as part of their oversight function.
C-EPA	Contractor working for EPA conducted the evaluation.
B-State	Contractor working for State conducted the evaluation.
EPA	EPA performed the evaluation or enforcement action.
State	State performed the evaluation or enforcement action.

BY
By indicates the agency who performed the evaluation/inspection.

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Evaluation Reason Type	Reason Description
04	Citizen Complaint

FOUND VIOLATION indicated whether or not the evaluation discovered a violation. It will contain the following values:	
Code	Description
Y	indicates that the evaluation did find violations.
N	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.
blank	converted from the previous system which did not have a definitive answer to whether or not violations were found.

Coverage Area/Violation Type	Description
GER	GENERATOR-ALL REQUIREMENTS (OVERSIGHT)
GRR	GENERATOR-RECORDKEEPING REQUIREMENTS

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

ATTACHMENT 4

Photographic Log

1. Satellite collection point in Water-Based Lab:
 - 5 gal container of hazwaste, upper left, was ~4/5 full
 - 10 gal red flam container held solvent for cleaning
 - 5 gal container, below, will be used once other bucket full (small amount of sludge in the bottom of this bucket)
2. 5 gal can of used rags, labeled "Oily Waste"
3. Second room of Water-Based Lab, satellite collection point:
 - 5 gal bucket of hazwaste (white bucket on ground)
 - 5 gal used rag container (red flam can on ground)
 - 5 gal bucket of "Non-Hazardous Waste" (white bucket on drum)
4. Lacquer Lab #2 satellite collection point:
 - 5 gal bucket of hazwaste (grey bucket with lid, far left) – screen under lid did not allow full closure – container practically empty
5. Physical Testing Room; 5 gal container of "Mercury Waste" (broken thermometers) from lab building–found open, w/4 thermometers poking out. Labeled "Hazardous Waste" and "Mercury Waste," but no date. Closed during inspection.
6. Lacquer Lab #1 satellite collection point:
 - 5 gal bucket of used solvent (middle, on ground), found open and unlabeled. Representative stated this was used MPK. Drained to closed, labeled container during inspection.
7. Screen removed from photo #6 hazwaste bucket, sitting on ground
8. Several small containers of paint left open to dry in Paint Lab satellite collection point
9. UV Lab – 5 gal container of hazwaste, open, ~1" of material in container. Representative stated this was mostly MEK with some UV materials.
10. UV Lab – 3 gal container of cleaning solvent, labeled "Rinse Tank"
11. UV Lab – test spray booth – representative stated spray nozzles currently cleaned by spraying MEK through them, into filter (white fabric square with green markings). Filters are then set out to dry and disposed of in facility trash.
12. Large workroom – container labeled "Oily Waste," holding a few rags inside

13. Large workroom – 5 gal container of waste below UV test machine – unlabeled, open, containing ~3" of waste. Representative stated it was waste acetone.
14. UV test machine referenced in photo #13
15. Storage Shed <90-day storage – two 5 gal open buckets, both ~1/3 full, unlabeled. Mr. Winkler stated he was unsure of the specific material, but that it came from the labs to dry here, before joining non-hazardous waste stream.
16. Storage Shed <90-day storage – two 55 gal drums, both closed, labeled and dated.
17. Storage Shed <90-day storage – shelf with several open cans (samples, raw materials), left to dry before disposal as non-hazardous.
18. Storage Shed <90-day storage
19. QC Lab
20. Standards Storage Room
21. Standards – some dated back to 2000 and 2001 (original date of shelving)
22. More standards
23. Paint/Stain Testing Room – 5 gal container full of used rags, closed, not labeled
24. Outside of QC Lab – 55 gal drum, ~1/4 full, labeled "Hazardous Waste," "QC Lab," no date
25. Location of drum from photo #24 (QC Lab building on left)
26. Alley between QC and manufacturing buildings – several 55 gal drums of raw materials, one (top center) in bad shape, labeled "ethylcellulose"
27. Same area as photo #26, another drum in bad shape, bulging, no product label visible
28. Main Manufacturing Building – Stain area, near Filter area – 55 gal drum of solid hazwaste, closed, no label
29. Stain area – Liquid on floor left over from tank cleaning – Mr. Rice states that this is usually cleaned up and disposed of after transfer.
30. Filter area – filter mechanism and associated hoses
31. Cleaning sink for tools from Stain Dept. (at right), two 5 gal buckets, open, unlabeled,

containing strainers, measuring cups in some kind of thinner blend.

32. Solvent header for Stain Dept.
33. Paint Dept. – 55 gal drum labeled only “Dirty Bag Filters,” below satellite accumulation point sign.
34. Near Paint Dept. – 55 gal drum w/funnel, closed w/loosely-fitting lid
35. Lacquer Dept. – 55 gal drum, 1/2 full of used filters, open, labeled only “Filter Drum.” Representative closed container during inspection, and stated that when full, these drums are brought to the <90-day area as hazwaste.
36. UV Building – 5 gal bucket of used rags, ~3/4 full, no label
37. UV Bldg – wash tank for cleaning batch screens
38. UV Bldg – batch screen sitting on 55 gal drum
39. Overview of satellite areas in Grinding Room
40. Color section of Grinding Room – 55 gal drum w/funnel and hose connected. Other end of hose open (top left in photo), funnel lid too small, leaving gaps. Labeled as hazwaste.
41. Grinding Room – wash tank for cleaning filters (mostly from maintenance, according to representative)
42. <90-Day Storage Area, w/hazwaste storage tank shown far left
43. In <90-Day Storage Area – four 5 gal buckets, three have no labels; bottom right bucket labeled “Hazardous Waste,” but with no date.
44. In <90-Day Storage Area – two 5 gal buckets labeled as hazwaste. Bottom bucket has no date. Top bucket's only cover is a lid from a 55 gal drum sitting on top.
45. In <90-Day Storage Area – 5 gal bucket labeled “Hazardous Waste” and “Thinner,” dated 1/13/05, lid is loose and leaves gaps.
46. In <90-Day Storage Area – burlap bag labeled “Hazardous Waste” and “2N025”, dated 3/17/05.
- 47-49. Photos of hazardous waste storage tank and ancillary equipment
50. Front left corner of secondary containment for hazwaste storage tank, showing crack from top to bottom

51. Inside of same corner from photo #50, showing crack goes all the way through containment wall.
52. Work-Off Storage Area
53. Work-Off Storage Area (some older-looking raw material drums in poor shape)
54. Work-Off Storage Area #2 – 55 gal drum labeled “Lac Bags.” Representative stated it should be labeled as hazwaste and be placed in the <90-day storage area.
55. Work-Off Storage Area #2 – about thirty-five 5 gal pails. Representative stated they were not work-offs, but was unsure of their contents or destination.
56. Exterior of Maintenance Building – four 55 gal drums of used rags w/water being sprayed into them
57. Same as photo #56, showing water spurting from hose into drum
58. Near Maintenance Building – two 55 gal drums labeled “Wastewater.” One was ~1/5 full of dirty-looking liquid. The other was labeled “04-04-05 test ok.”

AKZO Nobel
Roanoke, VA
VAD000019828

PHOTO 1



Satellite collection point in Water-based Lab
10 gal red flammable container holds solvent for cleaning
Top 5 gal HW container was about 80% full
5 gal container underneath is empty & for when 1st container gets full

AKZO Nobel
Roanoke, VA
VAD000019828

PHOTO 2



5 gal can of used rags, labeled "Oily Waste"

AKZO Nobel
Roanoke, VA
VAD000019828

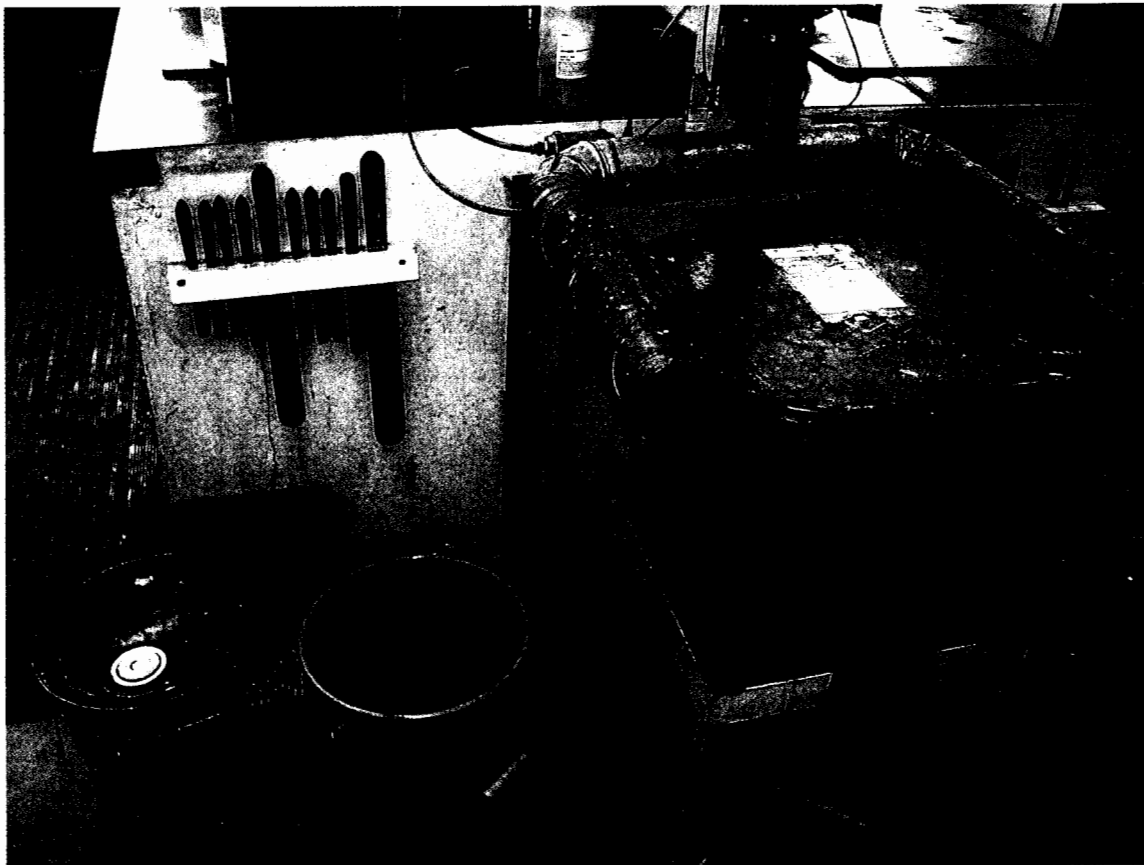
PHOTO 3



Water-based Lab (2nd room) Satellite collection point
5 gal HW container (white bucket on ground)
5 gal used rag container (red flammable can on ground)
5 gal container of Non-Hazardous Waste (white bucket on drum)

AKZO Nobel
Roanoke, VA
VAD000019828

PHOTO 4



Lacquer Lab #2 Satellite collection point
5 gal gray container on left contained HW
Screen under lid did not allow for closure of container
Waste is used solvent from the covered container on stand

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VAD000019828

PHOTO 5



Physical Testing Room

5 gal container of "Mercury Waste" (broken thermometers from Labs)

Container was open with 4 thermometers poking out of the spout

Labeled "Hazardous Waste" & "Mercury Waste" but undated

Container was closed during the inspection

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Roanoke, VA
VAD000019828

PHOTO 6



Lacquer Lab #1 Satellite collection point
5 gal container under rinse tank contained used solvent
Found open and unlabeled – facility personnel stated it was used MPK
Container was drained to a closed & labeled container during the inspection

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VAD000019828

PHOTO 7



Screen removed from Photo 6 on ground

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VAD000019828

PHOTO 8



Paint Lab Satellite collection point
Several containers of paint left open to dry

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PHOTO 9



UV Lab

5 gal gray container holding HW is open with about 1 " of material inside
Staff stated the waste was mostly MEK with some UV materials

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PHOTO 10



UV Lab – 3 gal container of cleaning solvent labeled “Rinsing Tank”

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PHOTO 11



UV Lab – Test Spray Booth Representative stated spray nozzles are cleaned by spraying MEK through them into the filter (greenish colored) Filters are then left to dry before being disposed in facility trash

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Roanoke, VA
VAD000019828

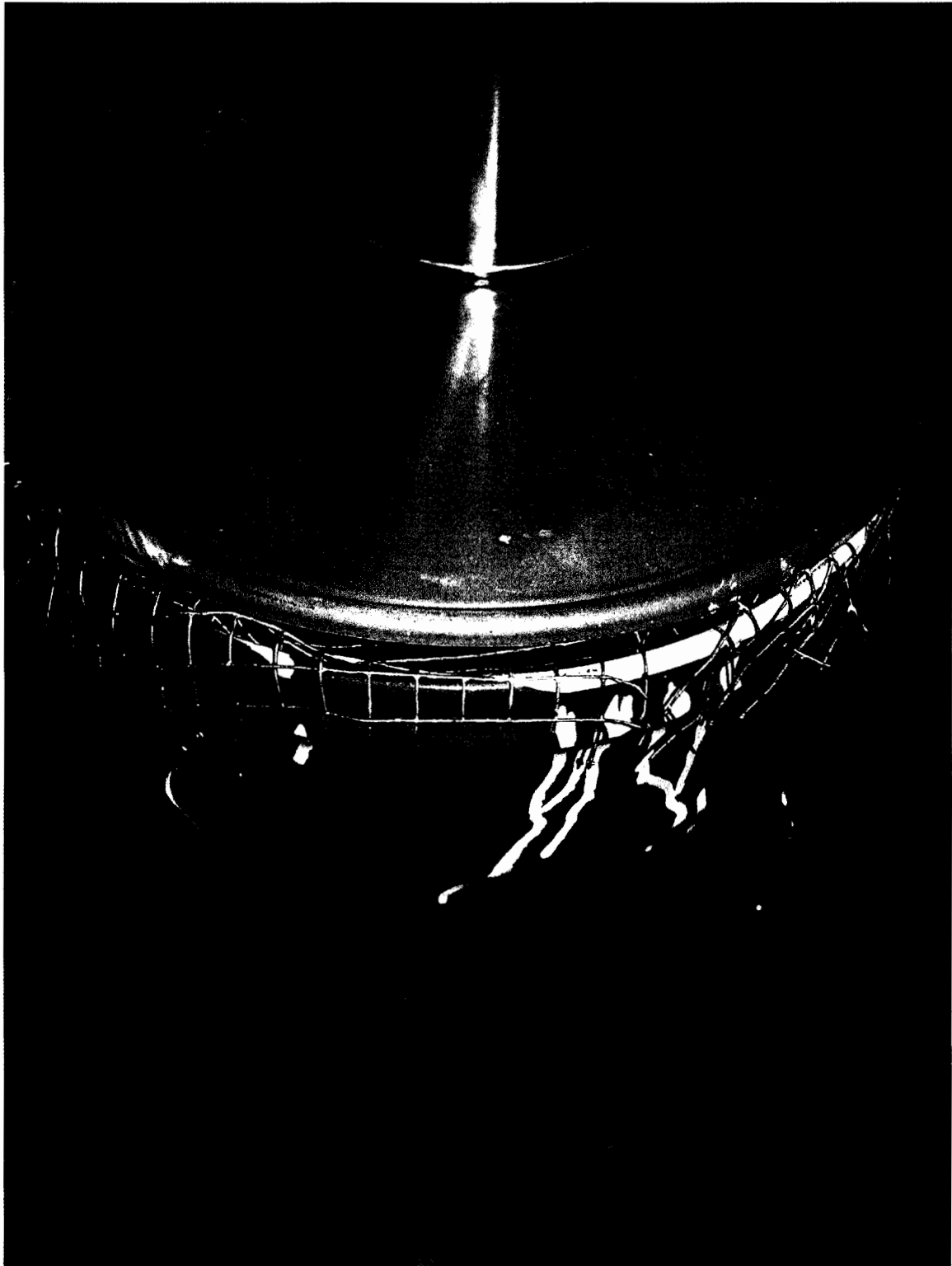
PHOTO 12



Large Workroom – container labeled only as “Oily Waste”
Some used rags inside

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Roanoke, VA
VAD000019828

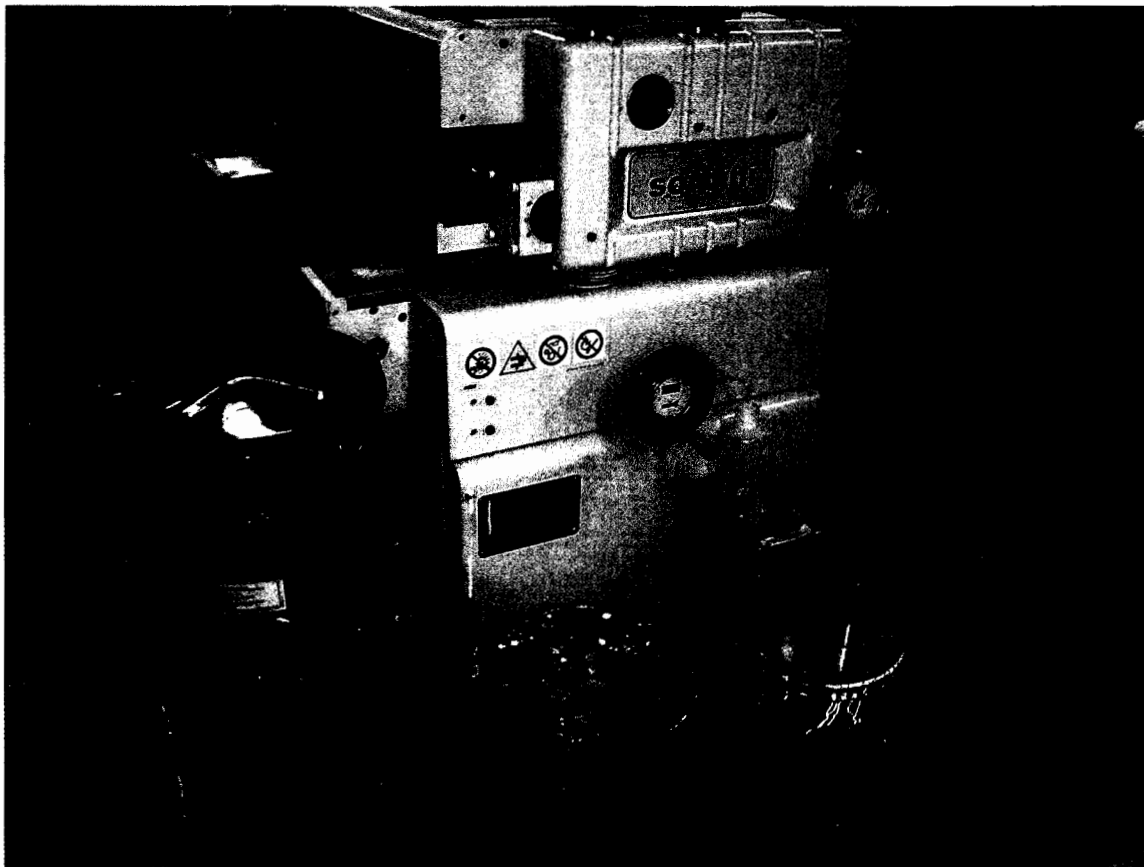
PHOTO 13



Large Workroom – 5 gal container of HW below UV test machine
Container was unlabeled and open with about 3” of waste inside
Representative stated it was waste acetone

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PHOTO 14



UV test machine referenced in PHOTO 13

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PHOTO 15



Less Than 90 Day Area – Storage Shed

Two open 5 gal containers, both about 1/3 full and unlabeled

Mr. Winkler stated he was unsure of the specific material but it was generated by the Labs and put to dry here before being disposed of as non-hazardous waste

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PHOTO 16



Less Than 90-Day Storage Area
Two 55 gal containers which are closed, labeled and dated

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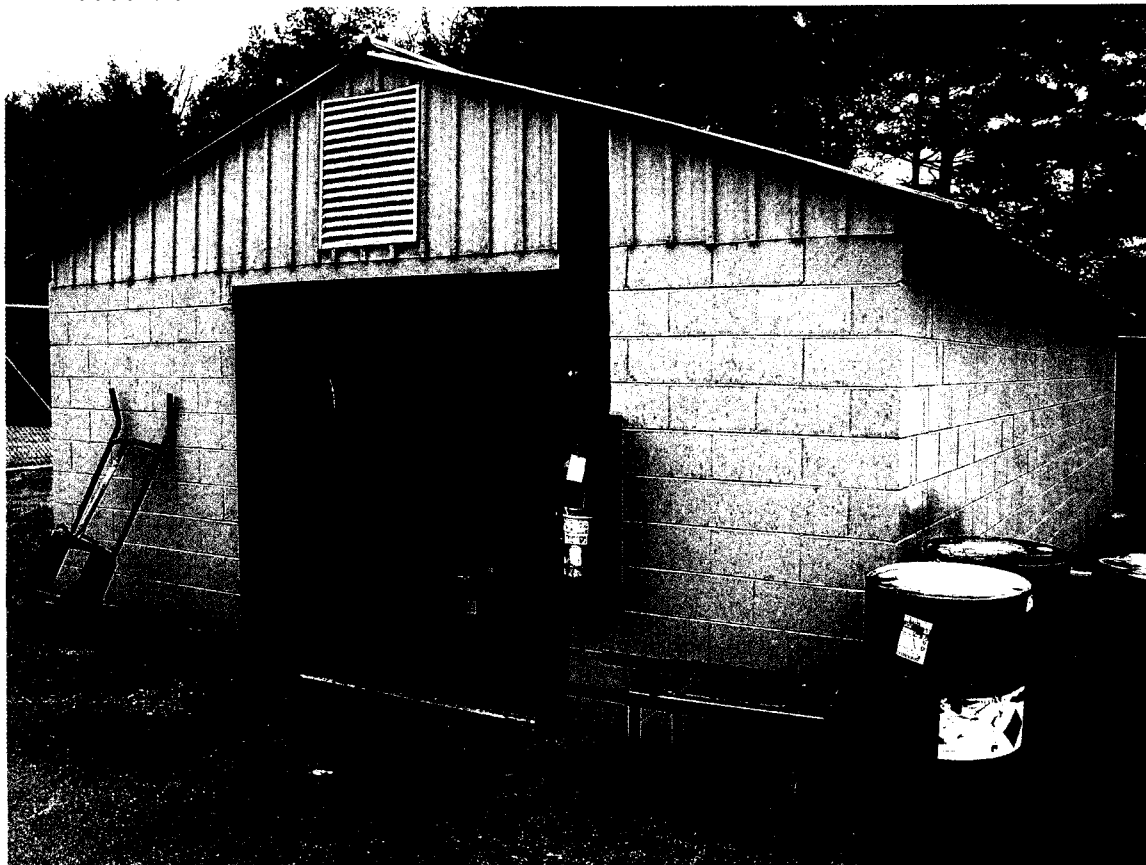
PHOTO 17



Less Than 90-Day Storage Area
Shelf with many open containers (samples & raw materials)
Containers are left to dry out before disposal as non-hazardous waste

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PHOTO 18



Less Than 90-Day Storage Area – Storage Shed

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PHOTO 19



QC Lab Building
As seen from across street from Office & Lab Building

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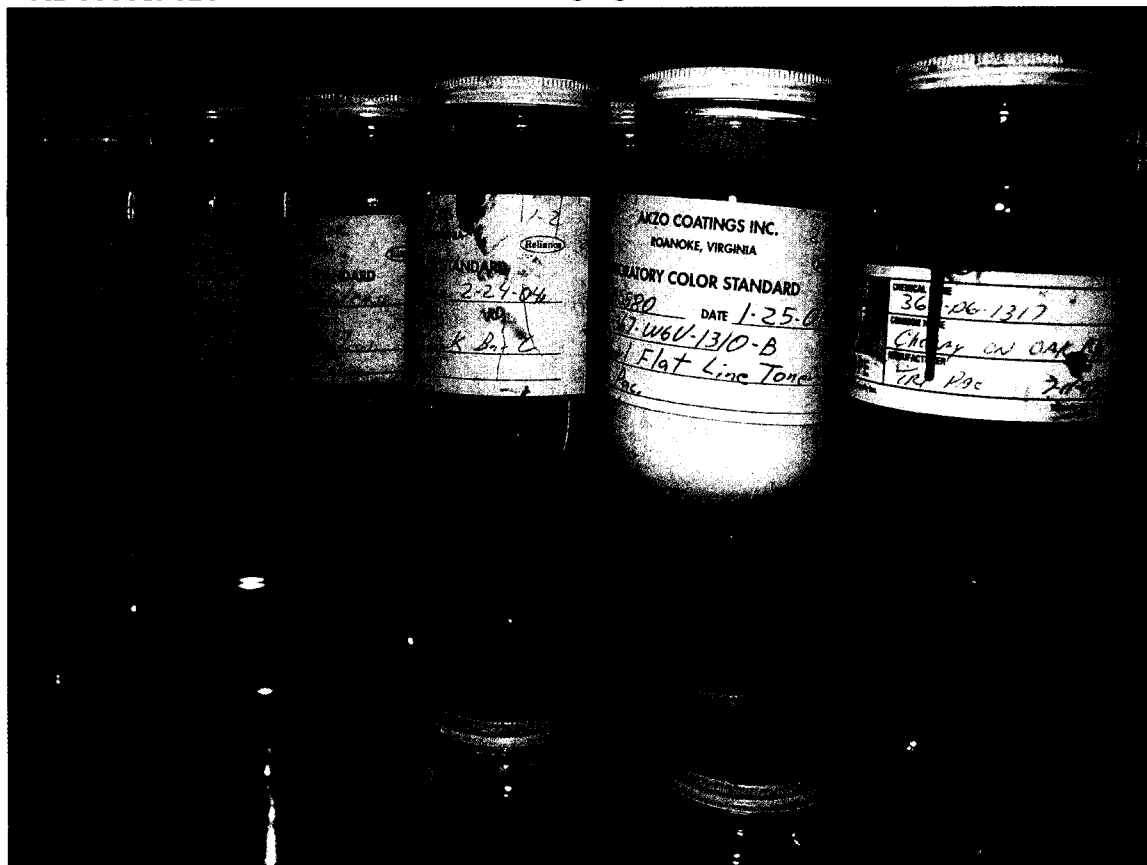
PHOTO 20



QC Standards Storage Room

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Roanoke, VA
VAD000019828

PHOTO 21



Standards – some dating back to 2000 & 2001

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VAD000019828

PHOTO 22



More standards dating back to 2000 & 2001

AKZO Nobel
Roanoke, VA
VAD000019828

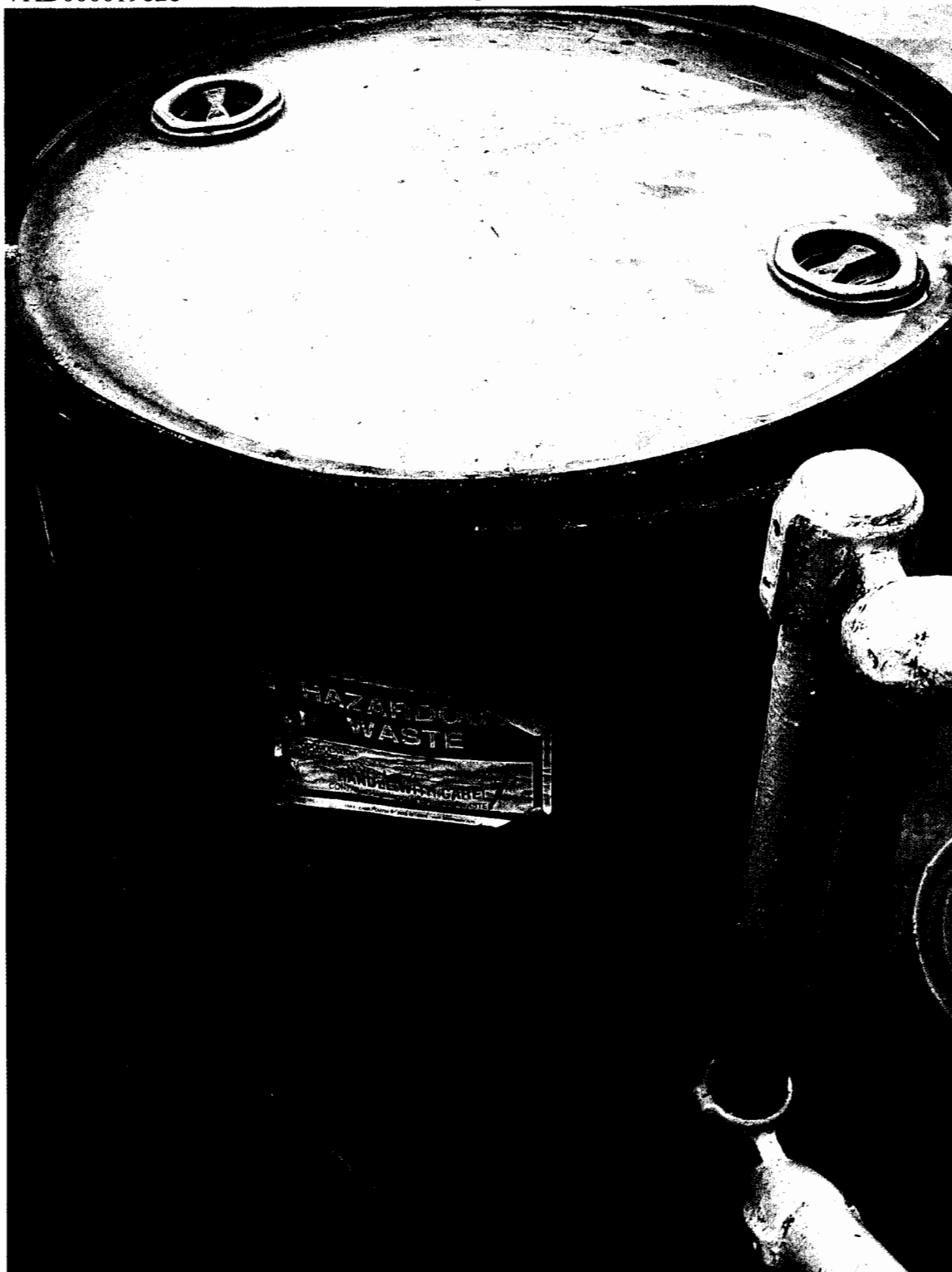
PHOTO 23



Paint/Stain Testing Room
5 gal container full of used rags
Found closed but unlabeled

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PHOTO 24



Alley outside of QC Lab door – Alley is between QC Lab & Manufacturing Buildings
55 gal container labeled “Hazardous Waste” and “QC Lab”
Drum was approx. $\frac{1}{4}$ full and unlabeled

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PHOTO 25



Location of drum from PHOTO 24
QC Lab Building is on the left

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PHOTO 26



Manufacturing Building wall of the alley between QC & Mfg
Several 55 gal containers of raw materials
The green container in bad shape is labeled "ethylcellulose"

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PHOTO 27



Same area as shown in PHOTO 26
Drum in center is bulging and in bad shape – No product label was visible

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PHOTO 28



Main Manufacturing Building – Stain Section, near filter area
55 gal container of solid HW
Drum was closed, unlabeled

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PHOTO 29



Manufacturing – Stain Section
Liquid on floor left over from tank cleaning
Mr. Rice stated this is usually cleaned up & disposed of after transfer

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VAD000019828

PHOTO 30



Manufacturing – Stain Section
Filter area – filter mechanism & associated hoses

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VAD000019828

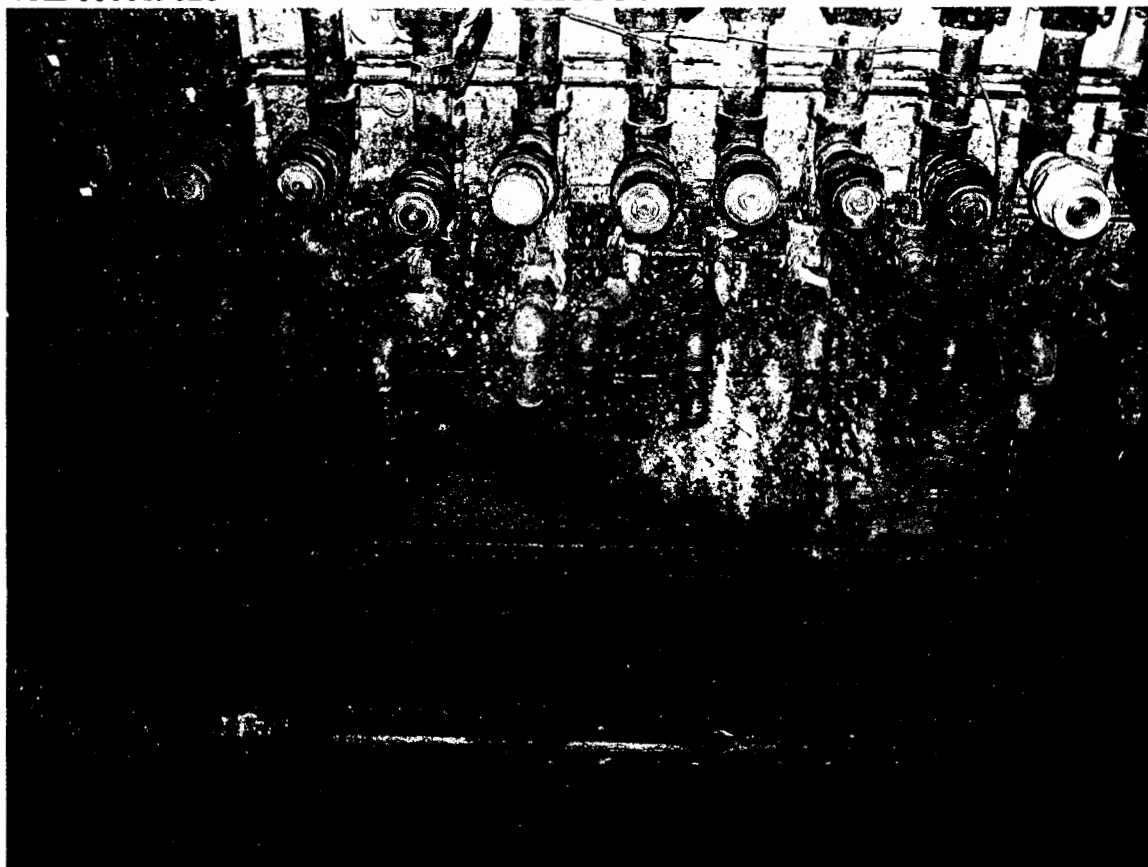
PHOTO 31



Manufacturing – Stain Section
Cleaning sink for tools from Stain Section
Two 5 gal containers are open and unlabeled

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PHOTO 32



Manufacturing – Stain Section
Solvent header for the Stain Section

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PHOTO 33



Manufacturing – Paint Section
55 gal container labeled only “Dirty Bag Filters”
Located underneath a sign “Satellite Accumulation Point”

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PHOTO 34



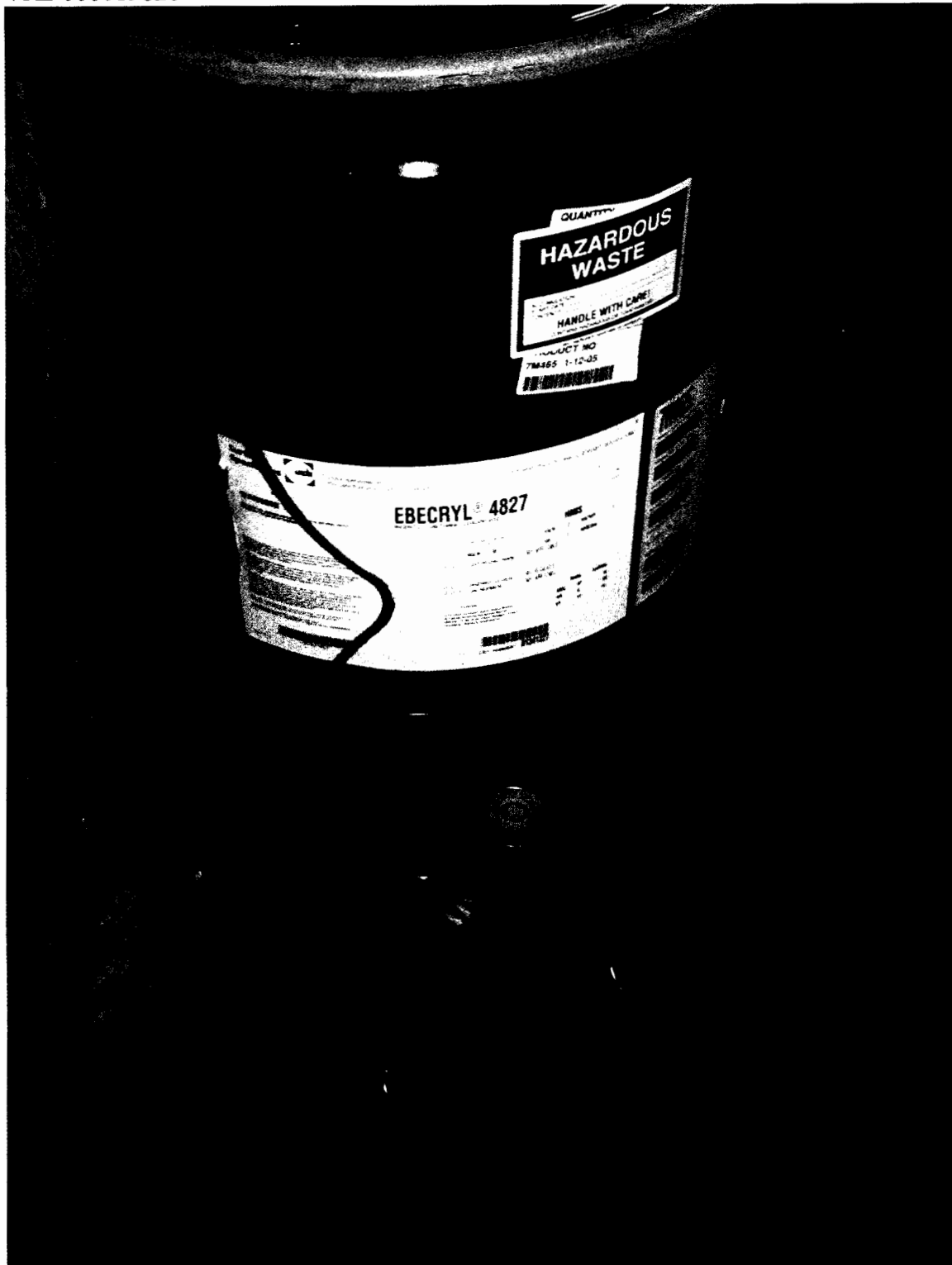
Manufacturing – Paint Section
55 gal container, closed but with a loose-fitting cover



Manufacturing – Lacquer Section -55 gal container about ½ full of used filters, labeled only “Filter Drum” Representative closed the container during the inspection and stated that, when full, these drums are brought to the <90-day area as HW

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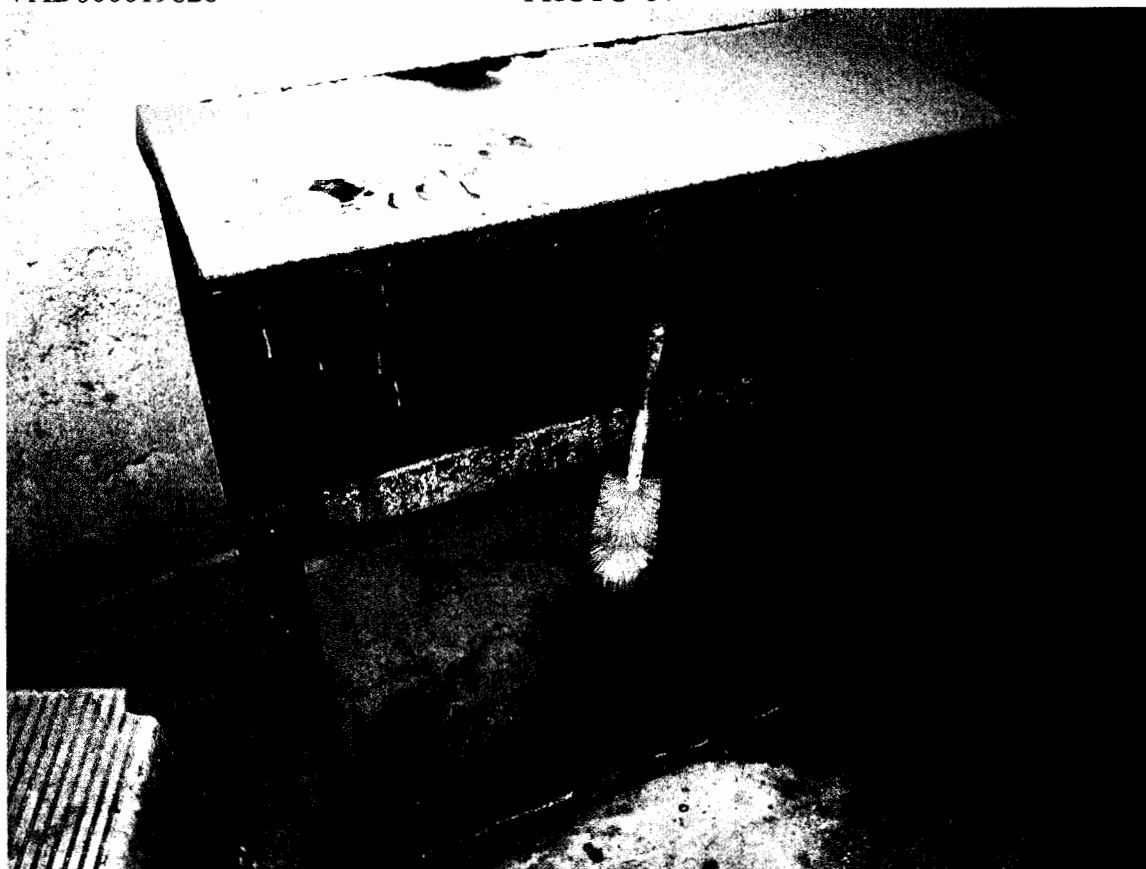
PHOTO 36



Manufacturing – UV Building
5 gal container of used rags (gray bucket), no label

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VAD000019828

PHOTO 37



Manufacturing – UV Building
Wash Tank for cleaning batch screens

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VAD000019828

PHOTO 38



Manufacturing – UV Building
Batch screen sitting on 55 gal container

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VAD000019828

PHOTO 39



Manufacturing – Grinding Section
Overview of Satellite areas

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PHOTO 40



Manufacturing – Grinding Section – Color Area
55 gal container with funnel and hose connected
Other end of hose is open (top left) Gaps in fit of hose and funnel to cover

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PHOTO 41



Manufacturing – Grinding Section - Wash Tank for cleaning filters
Representative stated it was mostly used by Maintenance Dept employees from a nearby building

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PHOTO 42



Main Less Than 90-Day Storage Area
Hazardous Waste Storage Tank is on the left

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PHOTO 43



Main Less Than 90-Day Storage Area
Four 5 gal containers, three are unlabeled
Fourth, on bottom right, labeled "Hazardous Waste" but not dated

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PHOTO 44



Main Less Than 90-Day Storage Area - Two 5 gal containers labeled as "Hazardous Waste". A lid for a 55 gal drum laying on top of the upper bucket is the only covering Bottom container is not dated



Main Less Than 90-Day Storage Area
5 gal container labeled "Hazardous Waste" and "Thinner" dated 1/13/05
Lid is loose and leaves gaps

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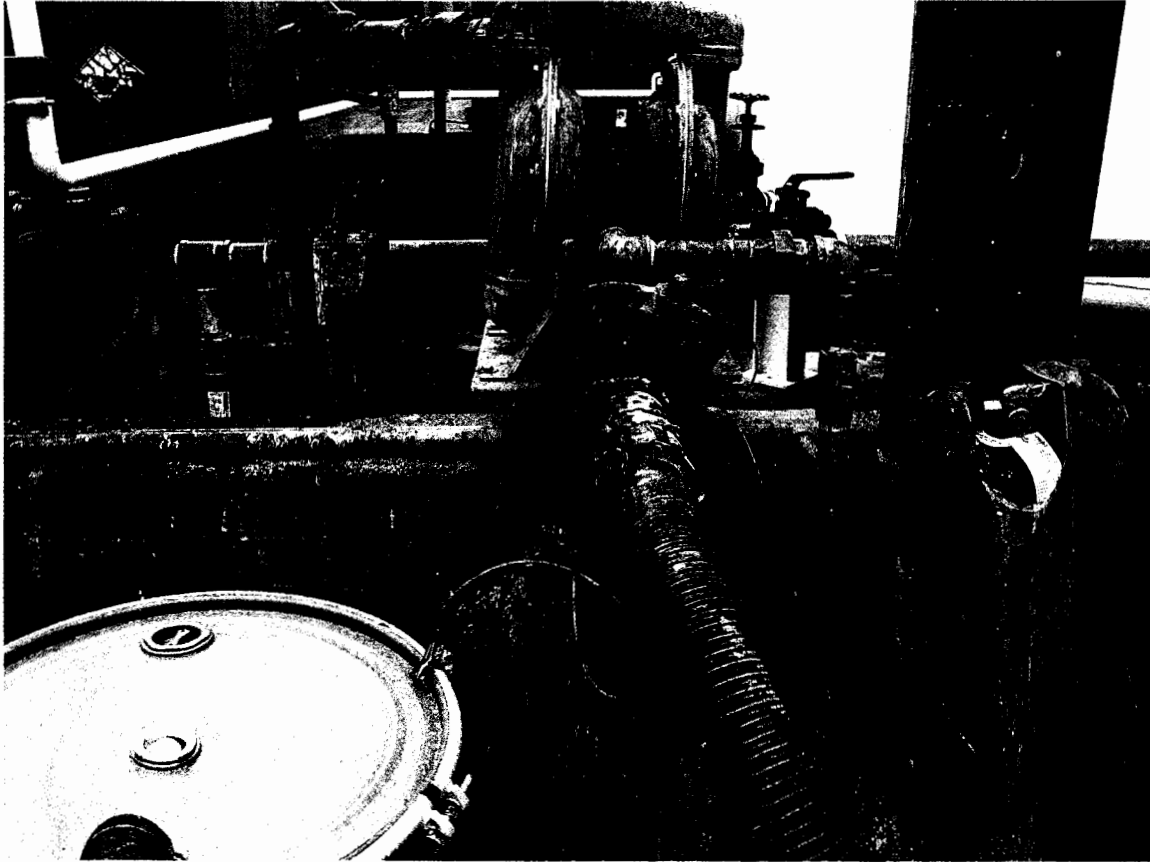
PHOTO 46



Main Less Than 90-Day Storage Area
Burlap bag labeled "Hazardous Waste" and "2N025"
Dated 3/17/05

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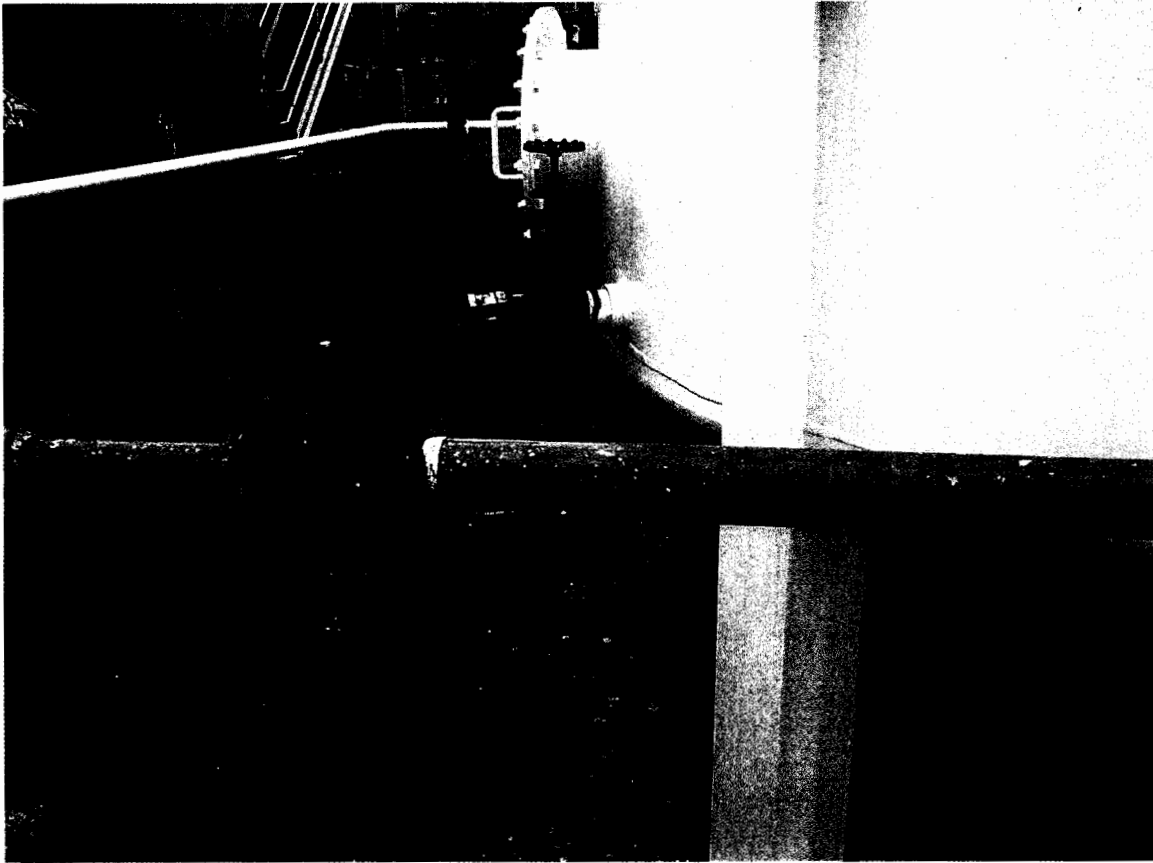
PHOTO 47



Hazardous Waste Storage Tank Area
Pump , hose and piping thru which Hazardous Waste is pumped into the Tank

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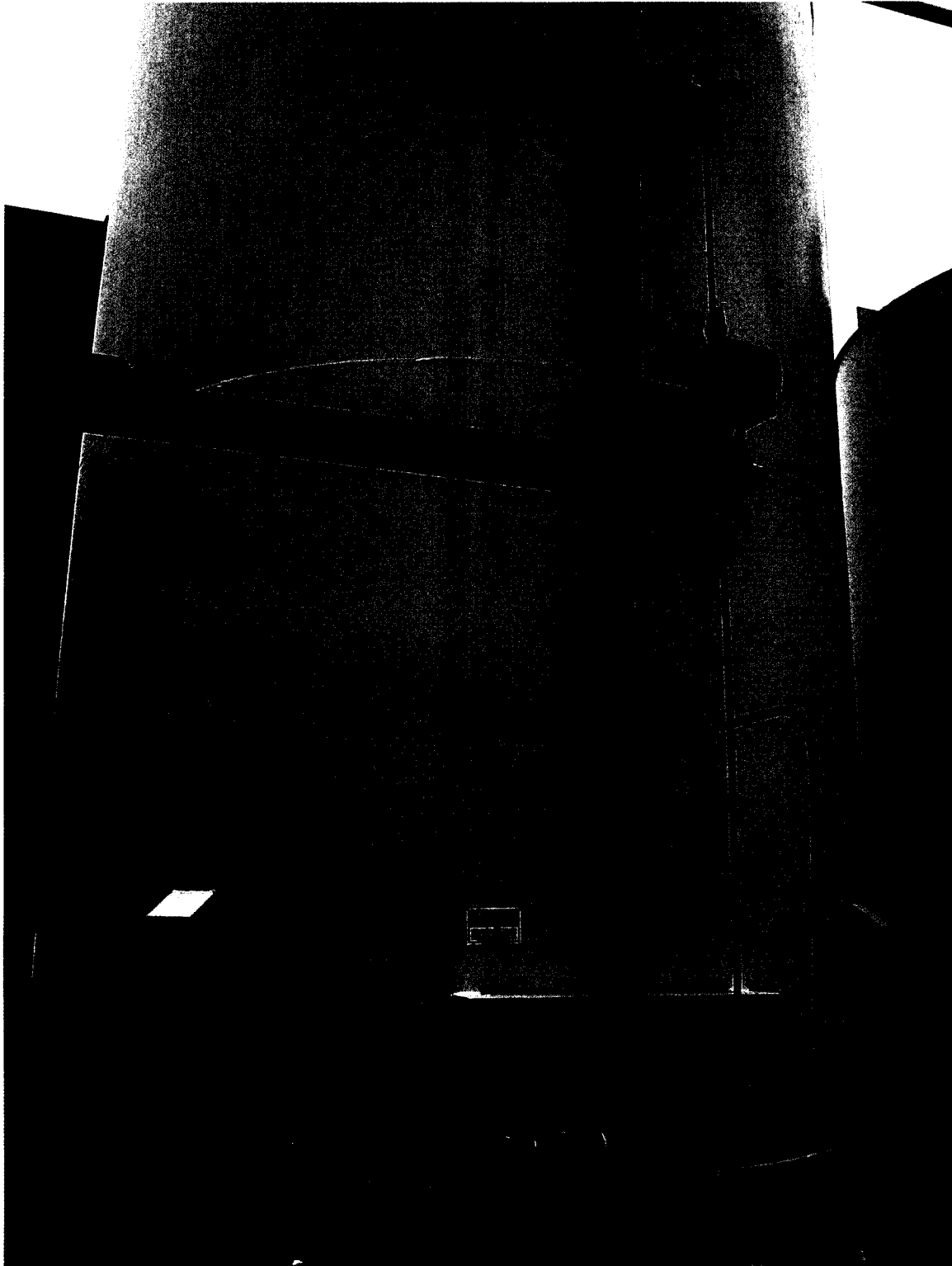
PHOTO 48



Hazardous Waste Storage Tank
Piping used to pump in and out of the Tank
The tank itself is in the forefront

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PHOTO 49



Hazardous Waste Storage Tank

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PHOTO 50



Hazardous Waste Storage Tank Secondary Containment
Front left corner of the secondary containment
Crack in containment goes from top to bottom

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PHOTO 51



Hazardous Storage Tank Secondary Containment
Same crack as shown in PHOTO 50 but from the inside of the containment
Shows the crack is through the entire thickness of the wall

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PHOTO 52



Work-Off Storage Area

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VAD000019828

PHOTO 53



Work-Off Storage Area
Older looking raw material drums, questionable container integrity

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Roanoke, VA
VAD000019828

PHOTO 54



Work-Off Storage Area #2 (By Main Less Than 90-Day Storage Area)

55 gal container labeled "LAC BAGS"

Representative stated the container should be labeled "Hazardous Waste" and moved to the Less Than 90-Day Storage Area

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Roanoke, VA
VAD000019828

PHOTO 55



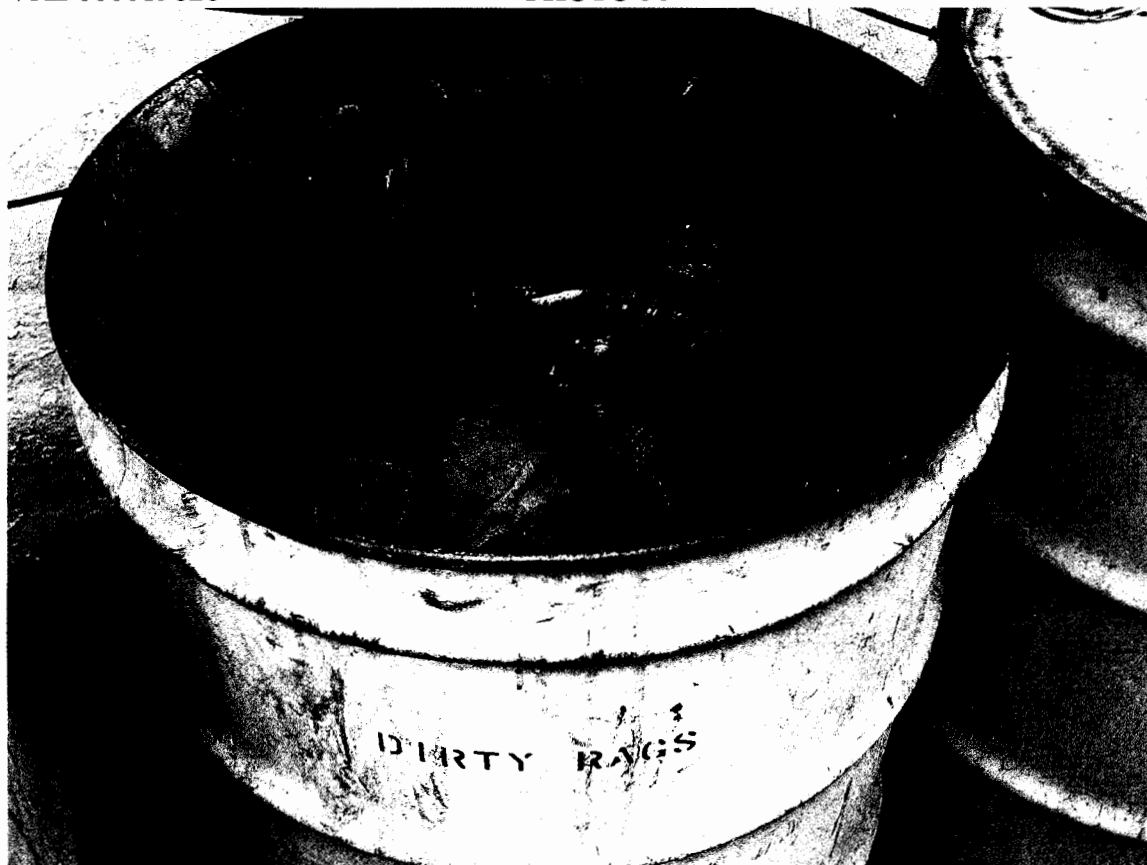
Work-Off Area #2 (By Main Less Than 90-Day Storage Area)

Collection of approx. 35 five gal containers

Representative stated they were not work-offs but was unsure of their contents and their destination

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Roanoke, VA
VAD000019828

PHOTO 56



Outside of Maintenance Building

Part of 4 drums where dirty rags are collected and sprayed with water from compressor
Note insert at 1:00 near top of drum. This is where the water is sprayed from

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VAD000019828

PHOTO 57



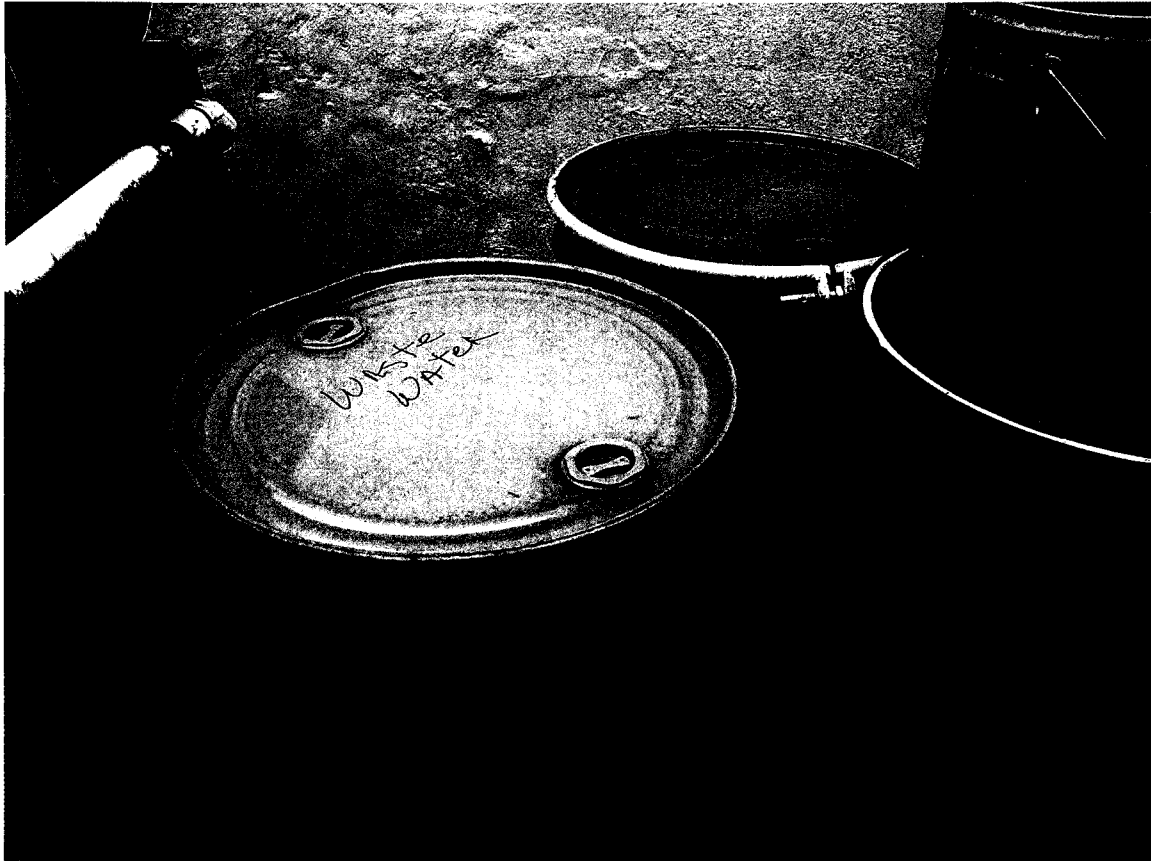
Same drum as from PHOTO 56

The water can be seen spraying from the insert

The tube can also be noted that is connected to all 4 drums in the same manner

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Roanoke, VA
VAD000019828

PHOTO 58



Outside of Maintenance Building

Two 55 gal containers labeled "Wastewater" One was labeled "04-04-05 test ok"
The other was approx. 20% full of dirty-looking liquid

ATTACHMENT 5

July 6, 1999

Mr. Sam Winkler
Akzo Nobel Coatings, Inc.
2837 Roanoke Avenue SW
Roanoke, Virginia 24015

Subject: **Report of Tank Integrity Assessment
Hazardous Waste Storage Tank No. 1
Akzo Nobel Coatings, Inc.
Roanoke, Virginia
LAW Project 20620-9-0694**

Dear Mr. Winkler:

As requested, representatives of Law Engineering and Environmental Services (LAW) visited the Akzo Nobel Coatings Facility in Roanoke, Virginia on May 18, 1999. The purpose of this visit was to perform a tank integrity assessment in general accordance with the Code of Federal Regulations (CFR) No. 264, Paragraph 191. This report contains information regarding the tank, the contents of the tank, ultrasonic thickness data, and the results of the engineering minimum thickness calculations and assessment.

Tank Description

According to Akzo Nobel Coatings, Inc. (Akzo Nobel) personnel, this 10,700 gallon hazardous waste storage tank was installed at the site in 1986. The tank has secondary containment. Reportedly, the tank contains a mixture of D001 (high TOC ignitable liquids), F003 (acetone, n-butyl alcohol, ethyl acetate, methanol, methyl isobutyl ketone, xylenes), and F005 (isobutyl alcohol, methyl ethyl ketone, toluene) hazardous wastes. These wastes have a specific gravity range of 0.81 - 0.85.

The tank is a vertical vessel, elevated from the ground with a conical bottom, and is supported by 4 legs. No drawings or design documents for the tank were provided by Akzo Nobel personnel. A sketch of the tank prepared from field measurements by LAW personnel on May 18, 1999 is provided on Figure 1. Physical measurements and visual observations of the tank are summarized below:

Diameter:	10 feet, 6 inches (Outer Diameter)
Height (Shell):	15 feet, six inches
Bottom Head Design:	~92 degrees - Conical
Top Head Design:	Flat
Design Pressure:	Atmospheric
Material of Construction:	mild carbon steel, type and grade unknown
Capacity:	10,700 Gallons
Age:	13 years
Corrosion Protection:	None

Hazardous Characteristics of the Waste Stored

As stated above, the waste stored in the tank is a mixture of D001 and spent solvent wastes (F003 and F005). According to information provided by Akzo Nobel personnel, the major components of the tank contents include the following constituents in general order by decreasing percentages: methyl ethyl ketone, butyl acetate, isobutyl acetate, lactol spirits and mineral spirits, water, acetone, ethanol, methanol, isopropyl alcohol, toluene, and xylene. These constituents are predominately flammable colorless liquids and are not corrosive to steel.

Corrosion Protection Measures

The tank has an epoxy coating on its exterior. There are no other corrosion protection measures (i.e., cathodic protection) on the tank or lines. As stated above, the tank is elevated and does not contact the ground surface.

Visual Observation

A visual observation of the tank external shell, mixer assembly, and external piping was performed. The vessel was fabricated with 2 shell courses. The measured height for each course was 7 feet, 9 inches. The top head has support beams across the diameter of the tank which support the pump and mixer assembly. The mixer lower bearing assembly is supported by four angle braces that are fillet welded to the tank shell. Piping utilized for the tank consists of one 3 inch (outside diameter) supply line, and one 3 inch (outside diameter) carbon steel drain line.

The tank system exhibited no evidence of significant corrosion, weld defects, cracks, or leaks during LAW's site visit. Details of the support legs are identified on the attached drawing (Figure 1).

Ultrasonic Thickness Measurements

A) Tank

Ultrasonic thickness measurements were performed on the tank shell, head and cone. The Orientation established for the tank for reporting purposes placed 0° at the center of the shell manway. Degrees increase in the clockwise direction when the tank is viewed from above. Thickness measurements on the tank shell and cone were taken at four elevations, beginning at the bottom circumferential shell weld, at 45°, 135°, 225°, and 315°. Four randomly selected areas on the head were tested. The lowest thickness measurement recorded in each of the tank sections was as follows:

- Shell 0.223 inches
- Bottom Cone 0.352 inches
- Top Head 0.266 inches

B) Piping

Ultrasonic thickness measurements were performed on the 3" supply and drain piping, at areas adjacent to each valve. The lowest measurement recorded was 0.192 inches.

A detailed exhibit of thickness measurement locations and values is attached (Figures 1 and 2).

Engineering Calculations

LAW performed minimum thickness calculations pertaining to the storage tank. These calculations were performed using the American Petroleum Institute (API) Standard 620 and 653, titled "Design and Construction of Large, Welded, Low-Pressure Storage Tanks" and "Tank Inspection, Repair, Alteration, and Reconstruction", respectively. These calculations are attached to this report. The following minimum allowable thicknesses were calculated for the tank sections:

- Shell 0.1875 inches
- Bottom Cone 0.1875 inches
- Roof 0.090 inches

The measured thickness for each of the tank sections was greater than the allowable minimum thickness.

Assessment Conclusions

The tank system exhibited no evidence of significant corrosion, weld defects, cracks, or leaks during LAW's visual observation performed on May 18, 1999. The tank head, shell, and cone thickness in areas measured exceeded the minimum calculated allowable thickness. Therefore, based on the information provided by Akzo Nobel personnel, and the results of LAW's site visit and engineering calculations, it appears that the tank system is adequate for continued use and storage of the hazardous waste.

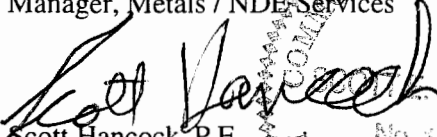
LAW appreciates the opportunity to provide our professional services to you on this project. If there are any questions pertaining to the information contained in this report or if we may be of further assistance, please contact us at your earliest convenience.

Sincerely,

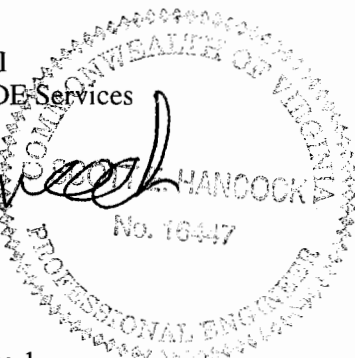
LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.



Mark A. Boger
Sr. Corporate NDE III
Manager, Metals / NDE Services



Scott Hancock, P.E.
Principal Engineer



Attachments: Figure 1
Minimum Thickness Calculation Sheet

API 620 MINIMUM THICKNESS CALCULATIONS FOR SHELL & CONE

Tank Identification: 10,700 Gallon AST
Location: Akzo Nobel, Roanoke, Virginia

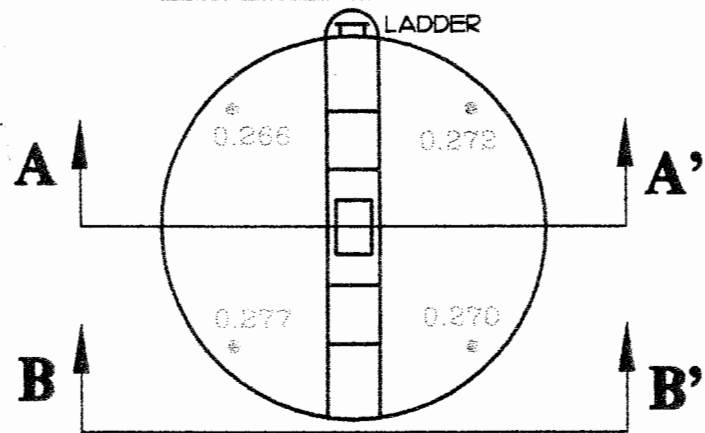
P(g) = MAXIMUM ALLOWABLE PRESSURE (#/in ²)	0.00
O = ANGLE OF CONE (degrees)	92.69
< = ½ ANGLE (radians)	0.81
R1 = RADIUS OF SHELL (in)	63.00
R2 = RADIUS OF SHELL @ POINT OF INTEREST (in)	63.00
R3 = RADIUS @ NECK OR TIP OF CONE (in)	3.00
H1 = HEIGHT OF SHELL (ft)	15.50
H2 = HEIGHT OF CONE (ft)	2.00
H3 = HEIGHT OF FLUID ABOVE SHELL (ft)	0.00
SG© = SPECIFIC GRAVITY OF CONTENTS	0.85
C = SPECIFIC WEIGHT (#/ft ³)	62.40
t© = ORIGINAL CONE THICKNESS (in)	0.375
S = MAXIMUM ALLOWABLE STRESS (#/in ²)	15200
E = WELD EFFICIENCY	0.70
CA = CORROSION ALLOWANCE	0

	<u>CONE</u>	<u>SHELL</u>
STATIC PRESSURE (#/in ²)	6.93	6.93
VOLUME OF CONE (ft ³)	145	145
CROSS SECTION AREA (ft ²)	87	87
WEIGHT OF CONE MATERIAL (#)	879	879
WEIGHT OF CONTENTS IN CONE (#)	9020	9020
TOTAL WEIGHT (#)	9899	9899
TENSION FORCE, T1 (#/in)	352.61	243.41
TENSION FORCE, T2 (#/in)	632.78	436.80
*MIN. THICKNESS, T1 (in)	0.033	0.023
*MIN. THICKNESS, T2 (in)	0.059	0.041

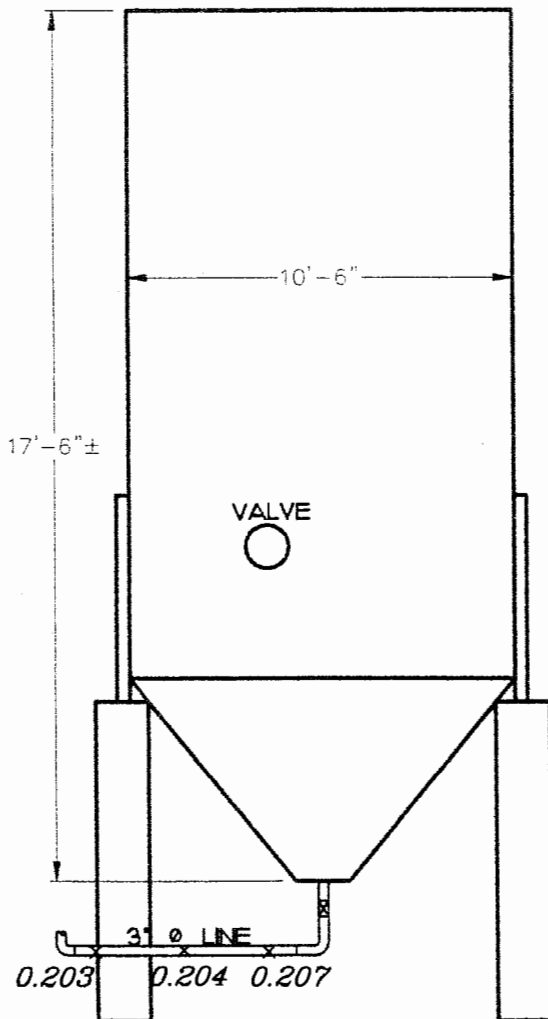
*NOTE: PER API 620, THE REQUIRED MIN. THICKNESS = THE GREATER OF
0.1875(in) OR THE CALCULATED MIN. THICKNESS T1; T2.

Prepared by: Olin Brimberry

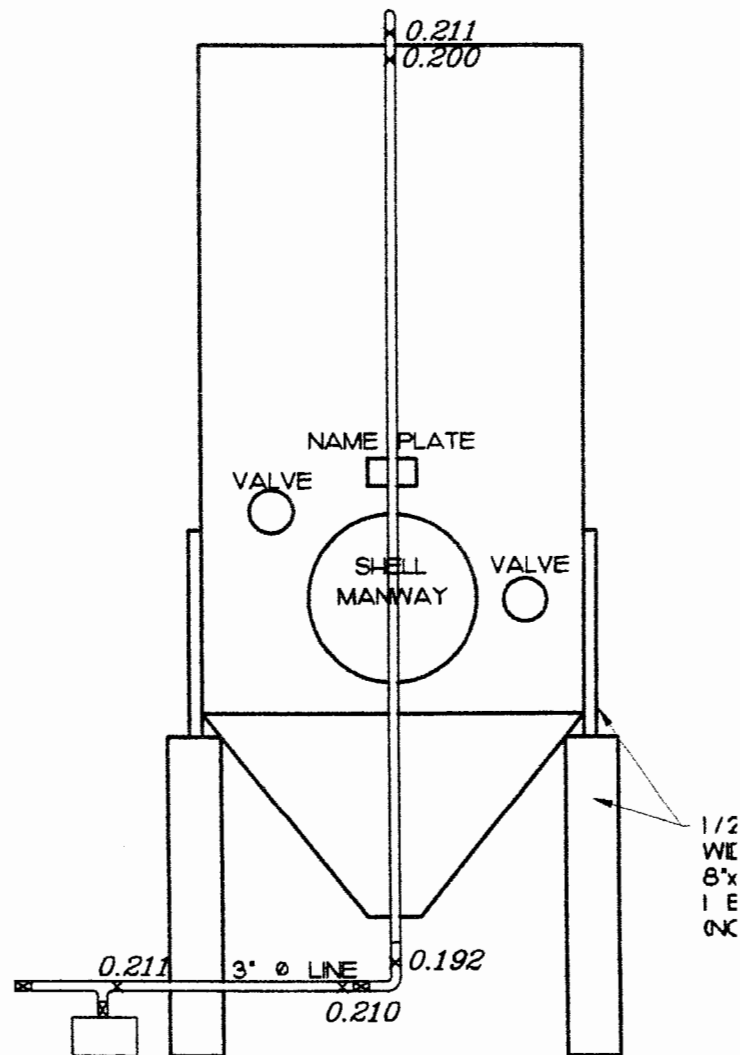
Checked by: Mark A. Boger



TOP VIEW



SECTION A-A'



SECTION B-B'

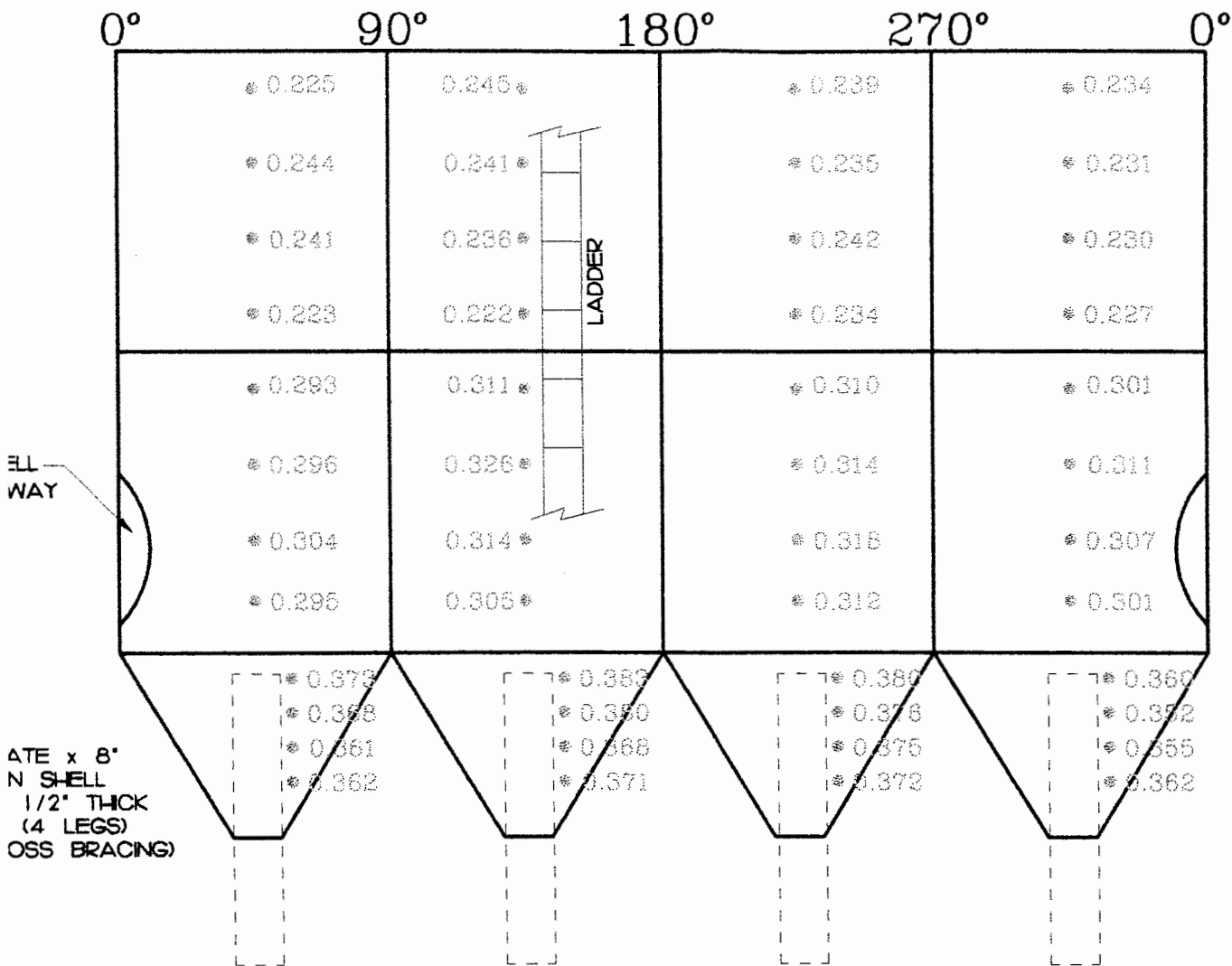
NOTES:

1. ALL MEASUREMENTS ARE IN INCHES.
2. ALL PIPE JOINTS ARE THREADED CONNECTIONS.
3. DRAWING NOT TO SCALE

06.21.99-12:35 694AKZ0.dwg

REF: FIELD NOTES BY
LAW PERSONNEL.

✖ 0.21
✖ 0.19



ALL LOCATIONS ARE APPROXIMATE.

SHELL AND CONE THICKNESS

IND:

ALVE

IDE SHELL MEASUREMENT POINT

IPE MEASUREMENT POINT



ENGINEERING AND ENVIRONMENTAL SERVICES, INC.
GREENSBORO, NORTH CAROLINA

ULTRASONIC MEASUREMENTS

AKZO NOBEL
HAZARDOUS WASTE - TANK #1
ROANOKE, VIRGINIA

PROJECT NO. 20620-9-0694

FIGURE

1

ATTACHMENT 6

75% Rule Monthly Report

Remaining Inventory

Thursday, March 31, 2005

Workoff Material	Batch #	Jan 1 Gals	Jan 1 Lbs	Current Stock		% Gals Worked Off	% Lbs Worked Off
				Gallons	Pounds		
M20-W6-720	W441462	110.00		110.00		0.00%	
M210-30W6V-329	W474969	593.00		428.00		27.82%	
M210-45W6V-335	W453854	265.00		265.00		0.00%	
M210-45W6V-335	W460357	100.00		100.00		0.00%	
M210-45W6V-335	W464620	240.00		240.00		0.00%	
M210-50Y6V-394	R535467	99.00		99.00		0.00%	
M240-30W6V-145	X442475	1,045.00		935.00		10.53%	
M367-D6V-1538	491600	25.00		10.00		60.00%	
M370-L6V-1164	528723	1,360.00		1,010.00		25.74%	
M373-W6-1046	W547308	165.00		165.00		0.00%	
M431-D6V-5503	R551207	510.00		180.00		64.71%	
M431-D6V-5503	W551207	335.00		335.00		0.00%	
M431-D6V-5506	363687	50.00		50.00		0.00%	
M506-D6-586	W474916	150.00		150.00		0.00%	
M508-D6-17	W171	330.00		275.00		16.67%	
M508-D6-17	W457676	100.00		100.00		0.00%	
M508-D6V-56	W172	520.00		440.00		15.38%	
M50-X6-1780	SW1080	55.00		55.00		0.00%	
M543-D6V-907	W496306	2,108.00		1,393.00		33.92%	
M548-D6-3312	W476694	250.00		50.00		80.00%	
M548-D6-3323	W534658	387.00		337.00		12.92%	
M548-D6V-3164	374299	150.00		50.00		66.67%	
Count:	22	Totals:	8,947.00	6,777.00			

ATTACHMENT 7

Emergency Contact Telephone Number

1-540-982-8301

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

VAD000019828

Manifest
Document No.
037712. Page 1
of 1Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

Akzo Nobel Coatings Inc.

P O Box 4627 Roanoke Ave. SW., Roanoke, VA 14015

4. Generator's Phone (540) 982-8301

5. Transporter 1 Company Name

Hazmat Environmental Group

6. US EPA ID Number

NYD080788947

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Glenn Resource Recovery Inc.

Rt 1, State Road 652

Arvonia, VA 23004

10. US EPA ID Number

VAD098443443

A. State Manifest Document Number

03771

B. State Generator's ID

C. State Transporter's ID NYD080788947

D. Transporter's Phone

718-827-7200

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

804-581-3226

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total

14. Unit

1. Waste No.

HM

a. X RQ, Waste Paint Related Material, 3, UN1263, PGII
(MEK, Toluene) ERG # 127 1998

No.

Type

Quantity

Wt/Vol

Waste No.

001

TT

0.5500

G

D001,D035
D039,F003,
F005

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

S-02 T-63

15. Special Handling Instructions and Additional Information

Profile 2317

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

SAM Winkler

[Signature]

09/16/03

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Fred Everhart

[Signature]

09/16/03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

GENERATOR'S COPY



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 896-4000
Emergency & Holidays: (803) 253-6488

121895 PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

VAD000019828

Manifest
Document No.
32197

2. Page 1
of 1

Information in the shaded areas is not required by Federal law, but is by State law.

3. Generator's Name and Mailing Address
AKZO NOBEL - ROANOKE
PO BOX 4627

ROANOKE VA 24015

Attention: SAM WINKLER

4. Generator's Phone (540) 955-3302

5. Transporter 1 Company Name

MAUMEE EXPRESS INC

6. U.S. EPA ID Number

NJD986607380

7. Transporter 2 Company Name

8. U.S. EPA ID Number

9. Designated Facility Name and Site Address

SOUTHEASTERN CHEMICAL & SOLVENT CO, INC
755 INDUSTRIAL ROAD PO BOX 175:
SUMTER, SC 29150

10. U.S. EPA ID Number

SCD036275626

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 732-968-7905

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

803-773-1400

11. U.S. Dot Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit
Wt/Vol

15. Waste Number

a WASTE FLAMMABLE SOLID, ORGANIC, N.O.S. (METHYL ETHYL
KETONE, ACETATES), 4.1, UN1325, PGIII

20 DM 10860 P

F005

F003

b WASTE FLAMMABLE SOLID, ORGANICS, N.O.S.
(METHYL ETHYL KETONE, ACETATES), 4.1, UN1325, PGIII

33 DM 10415 P

F005

F003

c NON REGULATED (WATERBASED COATING)

13 DM 6320 P

NREG

J. Additional Descriptions for Materials Listed Above Applicable EPA Waste Codes

A. SE 20499-F005 F005 F003 D001 D035

B. SE 36649-F005 F005 F003 D001 D035

C. SE 41595-NREG NREG

D.

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information Pick up site:

2837 ROANOKE AVENUE SW
ROANOKE, VA 24015

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

CHEMTREC EMERGENCY NUMBER 1-800-424-9300

If undeliverable, contact generator

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

SAM WINKLER STEVE OSEK

Signature

[Signature]

Month Day Year

09/27/04

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Mike Wyatt

Signature

[Signature]

Month Day Year

09/27/04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

12C = 7 DM 13C = 3402 12d = 6 DM 13d = 2916 P
11d = Waste Flammable Liquid, N.O.S. (ACETONE, TOLUENE), 3,
UN1993 PGII ID = F005, F003, D001

a 10860 lbs. c 3402 lbs.

b 10415 lbs. d 2916 lbs.

20. Facility Owner/Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Joy Alexander

Signature

[Signature]

Month Day Year

09/24/04




Giant Resource Recovery ♦ 755 Industrial Road ♦ PO Box 1755 ♦ Sumter, SC 29151 ♦ Phone: (803) 773-1400 ♦ Fax: (803) 775-7016

Dear Generator:

Please be advised the following discrepancies on your waste shipment are noted and require corrective action. The manifest is highlighted in the area where the correction needs to be made. **Details are noted in Section #19 of the manifest** unless it is a labeling issue.

- | Section
of manifest | Discrepancy |
|---------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> 1. | EPA ID # is incorrect or manifest # is missing or incorrect. |
| <input type="checkbox"/> 2. (pg 2-22) | Page # is incorrect or missing. |
| <input type="checkbox"/> 3. | Information is incorrect or missing. |
| <input type="checkbox"/> 4. | Telephone # is incorrect or missing. |
| <input type="checkbox"/> 5-F | Transporter is incorrect or missing information. |
| <input type="checkbox"/> 9-H | Facility information incorrect or missing. |
| <input checked="" type="checkbox"/> 11. (pg 2-28) | DOT shipping name is incorrect or missing information. |
| <input checked="" type="checkbox"/> 12. (pg 2-29) | Count* or type of container is incorrect. |
| <input checked="" type="checkbox"/> 13. (pg 2-30) | Quantity is missing or incorrect. |
| <input checked="" type="checkbox"/> 14. (pg 2-31) | Unit is missing or incorrect. |
| <input checked="" type="checkbox"/> 1. (pg 2-R) | EPA codes are missing or incorrect. |
| <input type="checkbox"/> 15. | Emergency Response # is missing. |
| <input type="checkbox"/> 15. | Additional EPA codes missing. |
| <input type="checkbox"/> 16. | Signature or date is missing. |
| <input type="checkbox"/> 17. | Signature or date is missing. |
| <input type="checkbox"/> 16,17. | The dates are inconsistent. |
| <input type="checkbox"/> 18. | Signature or date missing. |
| <input type="checkbox"/> 19. | Information entered is incorrect. (Facility error) |
| <input type="checkbox"/> Page 2 | The continuation sheet is not consistent with Page 1 state or country of origin. |
| <input type="checkbox"/> | The order of listing waste material is incorrect per CFR 172.201 (1)(i)(ii). (See attachment) |
| <input type="checkbox"/> | Quantities in 13 & 14 (a, b, c, or d) should be in pounds per Table II on reverse side of the manifest. |
| <input type="checkbox"/> | Manifest instructions are missing. (Required in South Carolina) |
| <input type="checkbox"/> | Labels on the drums were missing the accumulation start date. |
| <input type="checkbox"/> | Other _____ |

Please sign on the generator line below and return within 15 days from the date of receipt if **your discrepancy involves a count of item #12..** Otherwise, please keep the enclosed manifest and this letter for your records. If you have any further questions, please contact Joy Alexander at the number above, Ext. 210. Thank you for your prompt attention to this matter.



Generator Signature

*(Return only if #12 count is checked)

Maria T Pike
Southeastern Chemical & Solvent
Maria T Pike

ATTACHMENT 8

Hazardous Waste Material Coordinator

Employee: Wayne Underwood

Duties: Manages hazardous waste by removing full drums of hazardous waste from each satellite area daily or as requested by the department foreman. Replace proper empty waste drums to each satellite area immediately upon removal of the full drum to maintain only one 55 gallon drum in each satellite area at a time. Coordinates with each department to ensure proper labeling on the drums (red and white hazardous waste label). Drums are to be dated when full. Conducts and documents a daily inspection of the 90 day accumulation area and storage area. Inspection report to be turned in to the HSE Manager on a weekly basis. Any problems noted during inspection are to be turned in immediately to the HSE Manager. Starting at 8:30 a.m., pump hazardous waste which has been removed from the satellite areas into the 10,000 gallon waste storage tank. If additional waste is added, such as distressed products or raw materials that are no longer usable, continue pumping until finished. All pumping must be from the pad. All hose lines have to be inside the containment area. No drums of hazardous waste are to be located outside of the 90 day storage area. Log each drum of material that is pumped so the waste stream can be tracked. Weekly disposal report is to be given to the Waste Minimization Manager. Notify Waste Minimization Manager when a truck is needed for waste pickup. Assist in transfer of waste from tank to disposal truck. Insure all manifest are properly signed. Obtain sample of waste from the truck for analysis. Once each week on or about Wednesday, collect and ship water wash to High Point. Drums of solid hazardous waste must be weighed and recorded when filled. All drums of hazardous solid waste must be kept on the 90 day storage pad, on pallets with labels turned so they are readable. Responsible for maintaining the pit and keeping water pumped out of pit. This requires obtaining sample and taking to Analytical lab for analysis prior to pumping. Waste Minimization Manager or HSE Manager will give approval for pumping water. Responsible for monthly leak detection monitoring of all joints and valves using the PID detector, and a visual weekly pump seal inspection. This information is to be given to the HSE Manager on a monthly basis. Responsible for maintaining the pits in the return goods area using the same protocol as the pit in the 90 day storage area.

Qualifications: Knowledge of hazardous waste identification (characteristics) and RCRA regulations for container management to ensure compliance with satellite accumulation and 90-day storage area requirements. Trained in the proper operation of the PID unit. Trained in forklift operation and safety, and dangerous materials handling. Knowledge of safety rules and precautions and requirements for personal protective equipment. Knowledge of proper actions to be taken in case of a hazardous waste spill or other emergency.

When the above duties are fulfilled the employee will be utilized where ever needed.

Signed: _____ Date: _____

HAZARDOUS WASTE MANAGEMENT JOB DESCRIPTIONS

40 CFR 265.16 Personnel Training

(d) The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

(2) A written job description for each position related to hazardous waste management. The description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

Health, Safety, Environmental Manager

Employee: Sam Winkler

Duties: Oversees management of hazardous waste and RCRA required training of employees. Responsible for profiling and approval of hazardous waste streams for off-site recycling and disposal at permitted TSD facilities. Ensures TSDF's have proper regulatory authorization, maintain required records, have appropriate insurance certificates and are operated and maintained in accordance with RCRA regulations and permit conditions and requirements. Assists the Hazardous Waste Material Handler and the Waste Minimization Manager with regulatory expertise and other waste management activities as necessary.

Maintains all required RCRA documentation and reports for the minimum required time (3 years): Contingency Plan, hazardous waste management personnel training and job descriptions, uniform hazardous waste manifests (UHWM) and log, land disposal restriction notifications (land ban). Completes and submits the Annual/Biennial Hazardous Waste Report to the State and/or EPA and maintains copies of the Report on-site for the minimum required time (3 Years).

Schedules waste disposal pickups on a as needed basis.

Complies monthly waste activity report for corporate, and General Manager.

Qualifications: familiarity with basic laws and regulations (RCRA) pertaining to hazardous waste generation, storage, transportation, and disposal. Understand the information on the UHWM and land ban documents. Knowledge of labeling and placarding requirements for transportation of hazardous waste. Knowledge of the hazardous waste streams generated throughout the operation, the processes generating them, and characterization of the wastes. Knowledge of proper material handling safety rules and precautions and required personal protective equipment. Knowledge of proper actions to be taken in case of a hazardous waste spill or other emergency.

Hazardous Waste Minimization Manager

Employee: Steve Oser

Duties: Determines the condition of RGR and DGR materials, and whether the material is waste or reusable. Annotates this determination on the Returned Goods Report. Notifies the appropriate department in the plant of the decision. Determines when RGR and DGR materials are to be reworked into products. Keeps track of obsolete raw material and strives to work off material in batches. Notifies plant to ensure work-off materials are included in production. Compiles a monthly waste minimization report detailing these waste activities. Forwards a copy of these reports to the General Manager, Production Manager, Technical Director, and HSE Manager. Maintains inventory and records on finished goods, stock material, returned goods and distressed goods in house to be reworked. Work with all the labs and plant on procedures for the point source elimination or at least reduction of waste generation in all areas of the labs and production facility.

Qualifications: In-depth working knowledge of properties and characteristics of chemicals and materials stored on-site and used in manufacturing operations including raw materials, intermediates and finished products. Familiarity with processing operations, inventory control and QA/QC procedures. Knowledge of lab safety rules and precautions and requirements for personal protective equipment. Knowledge of proper actions to be taken in case of a hazardous waste spill or other emergency.

Hazardous Waste Material Handler

Employee: Jeff Reynolds

Duties: Manages hazardous waste by removing full drums of hazardous waste from each satellite area twice a day, at 7:30 a.m. and 3:00 p.m. each day or as requested by the department foreman. Replace proper empty waste drums to each satellite area immediately upon removal of the full drum to maintain only one 55 gallon drum in each satellite area at a time. Coordinates with each department to ensure proper labeling on the

drums (red and white hazardous waste label). Drums are to be dated when full. Conducts and documents a daily inspection of the 90 day accumulation area and storage area. Inspection report to be turned in to the HSE Manager on a weekly basis. Any problems noted during inspection are to be turned in immediately to the HSE Manager. Starting at 8:30 a.m., pump hazardous waste which has been removed from the satellite areas into the 10,000 gallon waste storage tank. If additional waste is added, such as distressed products or raw materials that are no longer usable, continue pumping until finished. All pumping must be from the pad. All hose lines have to be inside the containment area. No drums of hazardous waste are to be located outside of the 90 day storage area. Log each drum of material that is pumped so the waste stream can be tracked. Weekly disposal report is to be given to the Waste Minimization Manager. Notify Waste Minimization Manager when a truck is needed for waste pickup. Assist in transfer of waste from tank to disposal truck. Insure all manifest are properly signed. Obtain sample of waste from the truck for analysis. Once each week on or about Wednesday, collect and ship water wash to High Point.

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Responsible for maintaining the pit and keeping water pumped out of pit. This requires obtaining sample and taking to Analytical lab for analysis prior to pumping. Waste Minimization Manager or HSE Manager will give approval for pumping water.

Responsible for monthly leak detection monitoring of all joints and valves using the PID detector, and a visual weekly pump seal inspection. This information is to be given to the HSE Manager on a monthly basis.

Responsible for maintaining the pits in the return goods area using the same protocol as the pit in the 90 day storage area.

Qualifications: Knowledge of hazardous waste identification (characteristics) and RCRA regulations for container management to ensure compliance with satellite accumulation and 90-day storage area requirements. Trained in the proper operation of the PID unit. Trained in forklift operation and safety, and dangerous materials handling. Knowledge of safety rules and precautions and requirements for personal protective equipment. Knowledge of proper actions to be taken in case of a hazardous waste spill or other emergency.

Another responsibility will be daily mail runs to the post office.

When the above duties are fulfilled the employee will be utilized where ever needed.

Lab Aid

Employee: Ernie Johnson

Duties: Set up and label satellite accumulation containers . Transfer full hazardous waste containers (5 gallon container in each lab) to 90-day storage area in lab shed. Conduct and document daily inspection report to insure regulatory compliance. Transfer full drums of hazardous waste from the 90-day lab storage area to the hazardous waste tank area for pumping into the waste tank. Ensure that no hazardous waste is kept in lab shed for more than 90 days.

Qualifications: Knowledge of hazardous waste identification (characteristics) and RCRA regulations for container management to ensure compliance with satellite accumulation and 90-day storage area requirements. Trained in forklift operation and safety, and dangerous materials handling. Knowledge of lab and manufacturing area safety rules and precautions and requirements for personal protective equipment. Knowledge of proper actions to be taken in case of a hazardous waste spill or other emergency.

Analytical Chemist

Employee: Amy Egan

Duties: Through use of laboratory materials and instruments, prepare and analyze wet samples to determine composition and concentrations of constituents of each load of waste being sent off site. Analyze the contents of pit to determine if the water is solvent free prior to being released. Interpret test results and generate lab report of findings to be forwarded to the HSE Manager. Analyze spent material samples submitted by the Waste Minimization Manager to determine composition.

Qualifications: In-depth working knowledge of properties and characteristics of chemicals and materials stored on-site and used in manufacturing operations. Knowledge of proper sample preparation and test methods and ability to correctly interpret findings. Familiarity with all laboratory equipment and instruments. Knowledge of lab safety rules and precautions and requirements for personal protective equipment. Knowledge of proper actions to be taken in case of an emergency.

Revised January 04, 2001
Sam Winkler

ATTACHMENT 9

Akzo Nobel

from Sam Winkler

RCRA/Haz Waste Inspection
April 12, 2005

Update as of 4/18/05

The 5 gallon buckets being used in the labs for satellite accumulation must have lids on them. Lids must be closed when not in used. The screens being used can not be left on the bucket because the bucket will not close properly. If screens are going to be used they must be kept in a separate container which is properly closed.

Screens have been lowered, buckets all have lids on them 4/13/05

5 gallon bucket of waste not properly labeled.

All buckets properly labeled 4/14/05

All wash tanks need new labels

Tanks needing new labels have been corrected 4/14/05

55 gallon container partially filled outside of QC labeled hazardous waste (QC lab) not properly closed. QC had stated they did not have their own drum of hazardous waste.

Old drum has been taken to haz waste area new satellite area has been established for QC 4/14/05

QC lab and Maintenance must have their own satellite location for hazardous waste. Their waste can not be taken to the plant satellite areas for disposal.

New satellite area established for QC; Maintenance will take their waste to the 90 day storage area as generated

5 gallon bucket of broken mercury thermometers are not being handled properly. Lid not own and how do we dispose of them

In process of getting information from waste company on getting disposing the mercury

How do we determine what is or is not non-hazardous water waste

Drums marked non-hazardous have GC analysis run on them prior to shipping.

Manufacturing area all drums of dirty filters must have haz waste labels and be properly handled as haz waste.

All drums of dirty filters have labels on them 4/15/05

New signs needed in all satellite areas

New signs have been put up in satellite areas 4/14/05

90 day storage area has 3 five gallon containers that are not properly labeled

All containers have been properly labeled 4/13/05

2 cracks in dike wall at haz waste need to be repaired

Maintenance repaired haz waste dike and floor 4/16/05

Material labeled as hazwaste not in proper haz waste container in 90 day area

Material was improperly marked as haz waste has been changed 4/14/05

Drum of dirty filters not placed in proper waste location.

Filters have been placed in proper 90 day storage area 4/14/05

What does Cintas do with the rags from the plant

Rags are taken to NC facility where they are washed and the water is treated 4/14/05

Manifest from 2003 does not have TSD signature on it.

Request made to get a corrected copy of manifest. 4/18/05

Need to update Haz Waste job descriptions to show proper names and any new corrections

All haz waste job descriptions have been updated 4/15/05

HSE Manager needs to update his annual refresher training

HSE Manager is registered for seminar on August 25, 2005

Make sure all employees having jobs pertaining to haz waste have their training conducted by HSE Manager documented yearly.

RCRA and Haz Waste training to be conducted on April 29th 2005

Need to determine if there is a separate pressure vent on haz waste tank or if it is combined with the conservation vent.

Determined by Maintenance that we have both pressure and conservation vents on haz waste tank 4/18/05

Valves and joints need to be tagged and marked for identification purposes at the haz waste tank.

All valves and joints to be properly marked by May 2, 2005

RCRA/Haz Waste Inspection
April 12, 2005

Update as of 4/18/05

The 5 gallon buckets being used in the labs for satellite accumulation must have lids on them. Lids must be closed when not in used. The screens being used can not be left on the bucket because the bucket will not close properly. If screens are going to be used they must be kept in a separate container which is properly closed.

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